

Attachment 1: Errata
Commercially Guided Visitor Use and Other Services Environmental Assessment

(Attach this document to the Environmental Assessment to comprise a full and complete record of the environmental impact analysis.)

Introduction

This portion of the Errata indicates changes made after public and agency review of the Commercially Guided Visitor Use and Other Services Environmental Assessment.

Commercial Services Plan

The following text should be added to the Commercial Services Plan as noted below:

- The number of clients and guides has been restated from a guide to client ratio to a client to guide ratio. So a ratio that would have been stated as 1:4 in the first version of the plan is now stated as 4:1. The ratios have remained the same, with the exception of those that were proposed to exceed twelve people altogether (see Additional Services changes below).
- Page 43: The number of nights associated with single trip guides overnight trip was mistakenly identified as 6 rather than 5.
- Page 48 Guided Wilderness Alternatives table incorrectly identified the winter use and annual use limits for Alternative 2. Winter use should be 216 (72 x 3) and total annual use should therefore be 396, not 440.
- Page 56: The fact that Guided Alpine Wilderness trips are currently conducted by 4 IBPs is missing from this table (except with respect to the notation at the bottom of the page about the total number of clients guided by IBPs and the park concessioner).
- Page 62 Table: Did not list Guided Winter Activities, these activities are also not described as part of the Food, Gift and Lodging concessioner activities under Alternative 1, even though trips are led (as described on Table 1 of the EA).
- Page 62: Table also did not list Road Tours.
- Page 63- 64: Mountain circumnavigations were not described under Additional Services Alternative 1 (No Action) even though they are led by one IBP (as noted in the table on page 62).
- Page 66- 68 (should identify firewood sales) even if Common to All

Commercially Guided Visitor Use and Other Services Environmental Assessment

The following text should be added to the Commercially Guided Visitor Use and Other Services Environmental Assessment as noted below:

Edits

Multiple pages: extra underlining of letters or spaces appears

Multiple pages: et al. is not italicized

Page 10, 4th paragraph, 7th line: Change “management” to “manage”

Page 11, second to last paragraph 7th line: Change “for” to “of”

Page 15, last paragraph, 3rd line: Delete “5”

Page 21, second to last paragraph: Replace “five” with “six”

Page 37, 4th paragraph, 6th line: change 1980s to 1890s

Page 40, second to last paragraph, second to last line: Insert “landscape” before second “architecture”

Page 44, Table 8, 2001 figures: Change “11,959” to “11,688”

Page 44, delete underline from various numbers in Table 8

Page 44, 3rd paragraph after table: Replace “f” with “of”

Page 45, Table 8, 2001 figures: Replace “62” with “64” and “37” with “36”

Commercial Services Plan – Errata for the Environmental Assessment

Page 46, second to last paragraph: Replace “11,678” with “11,688”
Page 46, second to last paragraph, 9th line: Change “below” to “above”
Page 47 Table 10 Emmons Route: Replace 10,080 with 13,200.
Page 47, Table 10: Replace total for Muir “20,440” with “25,480”
Page 48 Table 11 **Total Use** for Cross Country Areas, the total should be 7925, not 7917. **Winter:** the total cross- country use should be 5096, not 5088. **Winter:** the total wilderness overnight use should be 7501, not 7493. These numbers were all off by 8.
Page 50, second to last paragraph: Delete “(See Wilderness Management Zones Map)”
Page 51, 5th paragraph: Modify last sentence to read: “In general, route aids, except where determined necessary for management, are not permitted in wilderness, however, active management of these has lapsed due to limited staff and no formal system for approval.”
Page 52, 2nd bullet, line 7: Replace “general” with “generate”
Page 53, last paragraph, line 4: Delete “were” and insert “have” before “involved”
Page 54, 4th paragraph, line 3: Replace “and” with “a”
Page 55, 4th bullet: Delete font change
Page 56, 1st paragraph: Insert space in parenthetical before “1998”
Page 56, italicized comment: Change “30 percent” to “1/3”
Page 74, 2nd paragraph: Delete “the”
Page 75, 5th paragraph, line 1: Insert “Guided” before “Wilderness”
Page 76, 4th paragraph, line 4: Change “in Appendix B” to “in the box in Appendix: 4- Step CUA/IBP Evaluation Process”
Page 81, 6th paragraph, line 1: Insert “Guided” before “Climbing”
Page 81, 7th paragraph, line 5: Change “and” to “or”
Page 83, 1st paragraph, line 2: Insert “Guided” before “Climbing”
Page 83, 5th paragraph, line 5: Change “of” to “or”
Page 84, 2nd paragraph: Delete first sentence.
Page 91, last paragraph, last line: Insert “Guided” before “Climbing”
Page 91, 1st paragraph, 1st line: Insert “Guided” before “Climbing” and before “Wilderness”
Page 91, 2nd paragraph, 2nd line: Insert “Guided” before “Climbing”
Page 92, 5th paragraph, 4th line: Insert “Guided” before “Wilderness”
Page 92, 6th paragraph, last line: Insert “Guided” before “Climbing”
Page 94, 5th paragraph, last line: Replace “2/10” with “one- half”
Page 97, 4th paragraph: To the end of the last sentence, add “, although this kind of increase would be highly unlikely to occur given other limiting factors”
Page 97, 6th paragraph, 6th line: Insert “and therefore people” following “CUAs”
Page 98, 4th paragraph, 5th line: Replace “over” with “just under”
Page 100, 8th paragraph, 2nd line: Delete “continue”
Page 103, 1st paragraph: Move the last sentence in this paragraph, which applies to the Guided Climbing Alternatives, to the bottom of the previous page (above the heading).
Page 109, 2nd paragraph, 2nd line: Replace “negligible” with “moderate”
Page 109, 4th paragraph, 3rd line: Insert “choice” after “greatest”
Page 111, 1st paragraph after bullets, 2nd line: Delete “would be used”
Page 111, 1st paragraph after bullets, 3rd line: Delete “now”
Page 113, 2nd set of bullets: Delete italics in 5th bullet
Page 113, 2nd set of bullets: Replace “to” with “in” in last bullet
Page 115, 4th paragraph, last line: Insert “day or” before “overnight”
Page 115, 6th paragraph, 5th line: Insert “a” before “similar”
Page 124, National Park Service, Mount Rainier National Park: Replace “Croscetto” with “Crosetto”
Page 124, National Park Service, Mount Rainier National Park: Insert “former” before Chief of Interpretation”
Page 126, following 6th reference: (from page 79) Insert “Macartney. 1982.”

Missing Information

Page 20, Table 1: Missing user nights for mountain circumnavigations should be 840.

Page 44, Table 8: Identify footnotes: “*” denotes missing information, # denotes information not distinguishable (only total numbers reported that year due to changes in reporting system).”

Page 45, 1st paragraph, 4th line: insert “is unknown” after “activities”

Page 46: 2nd paragraph after table: Insert “because some commercial groups are not consistently identifying themselves as commercial groups” to the end of the last sentence.

Two summary paragraphs, similar to the one following Table 9 on page 46 were inadvertently excluded from the summaries of overnight climbing and wilderness visitor use sections.

1) Page 47, after Table 10: Insert the following missing paragraph:

“This comparison demonstrates that although the Wilderness Management Plan overnight use limits allow tremendous additional capacity in overnight camps and zones that the existing significant increases (48 and 46 percent respectively for the Muir and Emmons routes) over time in guided climbing numbers could continue to increase significantly because the total number of climbers (11,688 in 2001) is far below the camp capacities (25,480) for the Muir Route alone. These increases could occur, despite the perception by many staff and climbers that these areas are already filled to capacity, particularly on sunny summer weekends. Additional use, therefore would have to occur during the week and in shoulder seasons.”

2) Page 48, following Table 12: Insert the following missing paragraph:

“This comparison demonstrates, similar to the above notes on guided climbing, that there is tremendous additional capacity present in the Wilderness Management Plan camp and zone limits (note: while the foregoing tables were a summary of just climbing, the above tables include both climbing and other wilderness use). The potential for this capacity is true even though, these camps are already filled to capacity, as documented by the Wilderness Camp Reservation System, on sunny summer weekends and for Wonderland Trail camps, during many nights in July and August. This is because these tables take into account use that could occur over the whole season and during all days of the week, even though the shoulders may or may not be suitable for the activity. Thus, while additional capacity is demonstrated by the comparison, staff analysis and visitor experiences contrast dramatically by noting moderate crowding (see *Encounters* below) or unacceptable resource damage (see *Resource Impacts* below). Therefore, even though there seems to be dramatic capacity in the 132,580 camper nights noted in Table 11, compared to the 50,474 actual camper nights noted in Table 12, the availability is during times and days not preferred by many visitors. In addition, if the use did increase to meet these limits, additional impacts associated with this increase by nearly 1/3 would be strongly felt, especially in the demand for parking and the ability to reserve campsites or to complete preferred itineraries. Figure 2, shows that demand for this capacity continues to rise.”

Page 104, 6th paragraph: Delete this paragraph and replace with: “This alternative would continue to result in a moderate degree of choice and competition among commercial wilderness trip service providers, with no restrictions on trail use or the types of trips offered.”

Page 105, 2nd paragraph: Delete this paragraph and replace with: “This alternative would continue to result in a low degree of competition and choice for guided alpine wilderness service providers and trips.”

Modified Information

Page 6, last paragraph: Add the following to the end:

“The Wilderness Management Plan limits only affect overnight visitor use. They were developed based on the physical carrying capacity of designated camps and zones and have been modified routinely over time to reflect changing use patterns and conditions. While they do serve as overall

limits, many are likely beyond the other components of carrying capacity – social and resource. In addition, these limits did not evaluate what portion should be used for commercial visitor use and what portion for independent visitor use.”

Page 7, 2nd paragraph, 2nd line: Replace “twice” with “three times”

Page 7, 3rd paragraph, 6th line: Insert “and conditions for” following “new limits”

Page 7, 3rd bullet: Begin with “To prevent the dramatic increase in guided climbing over time allowed by the existing limits, manage”

Page 7, Guided Climbing (2nd set) bullets: Replace 2nd bullet with:

- Decrease the potential for dramatically increasing the potential number of guides and clients that would be able to participate in commercial activities on the Muir Route to be more consistent with the actual numbers occurring now.

Page 7, Guided Climbing, 4th bullet: Insert “or modify” after “Eliminate”

Page 8, first bullet: Delete end of sentence beginning with “but”

Page 8, 3rd bullet: Add to the end “(Alpine Winthrop and Alpine Nisqually/Paradise)”

Page 12, first paragraph last 3 lines – delete. According to the current concessioners contract, there is no upper limit on the number of mountaineering day school spaces allotted.

Page 16, Alternatives Considered But Rejected: Add the following paragraphs

Shuttle Requirements

The planning team considered a suite of requirements that would increase the beneficial effects of requiring shuttles for some visitor transportation needs, including the shuttle’s physical capacity and fuel type. These additional requirements, however, were rejected due to the inability of the Commercial Services Plan to do more than take preliminary steps towards implementing parkwide shuttle goals in the General Management Plan.

Alternating Commercial Free Areas

Rotating commercial and non- commercial use was considered but rejected by the planning team because it would be difficult to manage and because it would make commercial free areas subject to change rather than inviolate.

Weekend Commercial Use on All Routes

Not restricting commercial use on weekends was considered but rejected by the planning team because it was inconsistent with current effective management of the Emmons Route. The level of commercial activity that could occur, through the implementation of this plan, is higher than that currently occurring. The plan seeks to ensure that independent parties are not significantly hindered in their attempts to obtain reservations for overnight use. Independent weekend visitation is generally higher than weekday visitation and the limited weekend commercial use restrictions proposed by the plan is one tool that may help to shift some commercial visitation to periods of lower use, thereby ensuring a better experience for all.

Free Guiding

The concept of free guiding (any guide guiding any route at any time) was considered but rejected by the planning team because it is inconsistent with NPS concession regulations and because the visitor experience associated with this type of guiding would be difficult to manage.

Whole Park Commercial

Not having commercial free areas did not meet the purpose and need for the plan and was considered but rejected by the planning team. Because commercial free areas were determined to be an important component of the Commercial Services Plan, this idea was considered but rejected in the planning process. As noted above, offering a range of wilderness experiences

ensures that all visitors will be able to experience the wilderness character of Mount Rainier to their personal expectations.

Not Establishing Client to Guide Ratios

Not establishing client to guide ratios was considered but rejected in the development of the alternatives because the park expects a minimum standard that will both allow the guided climb to be led safely and ensure that guided climbers who drop out along the way can continue to be accompanied by guides, thereby both ensuring the safety of the continuing climbers and increasing the summit success ratio for the guide service. The current client to guide ratio, therefore, may have an indirect effect of changing guided climbing group sizes to a mixture of nine clients and three guides.

Different Numbers of Concessioners

A variety of guided climbing and other alternatives were considered by the planning team, including up to 5 regular concessioners would be possible on the Muir Route, up to 3 concessioners on the Emmons Route and up to 2 concessioners on the Kautz Route, without rotation, given the other objectives in the Commercial Services Plan (including limiting impacts to independent use by not allowing commercial weekend use of other than the Muir Route, ensuring viable business opportunities, etc.). These were rejected by the planning team as difficult to manage given unpredictability associated with route seasons and conditions.

Page 17, last paragraph, change the following text:

2) as a percentage of total maximum space either per camp or zone or for the park (number of campsites or user nights)

Page 19, Table 1: Replace 26,880 with 27,240.

Page 51, 6th paragraph: Add to end: “Current helicopter use also includes transport of supplies for concessioners.”

Page 73, 3rd paragraph: Insert “and because inclement weather and route conditions would continue to result in limiting the number of users on these routes”

Page 83, 4th paragraph, last sentence: Add to end: “Unlike the increase in the number of vehicles on the Westside Road, if shuttle vehicle trips were introduced on the Carbon River Road, the number of vehicles would actually decrease, because private vehicles would no longer be allowed. This would result in a minor localized beneficial impact associated with impacts to water quality from use of this unpaved road.

Page 87, 3rd paragraph (under Alpine): Change “the greatest” to “there is great” and delete “is”

Page 87, 3rd paragraph (under Alpine), 1st sentence following bullets: Insert “,because of its nearly unlimited potential to result in additional use,” after “Alternative 1”

Page 87, 3rd paragraph (under Alpine), following bullets: Insert “As noted elsewhere in the analysis, this potential would be somewhat reduced due to the fact that climbing, like other recreational activities in the park is limited to appropriate seasons given changing weather and route conditions.”

Page 90, 3rd paragraph: Insert, before 1st sentence: “Because there would be limits on overall commercial use,”

Page 90, 3rd paragraph, 7th line: Replace “Because” with “Similar to other analyses,”

Page 90, 3rd paragraph, 8th line: Insert “independent” before “use capacities”

Page 90, 3rd paragraph, 10th line: Delete two sentences starting with this line and replace with: In Alternatives 2- 4, commercial use is capped and as in Alternative 1, independent use levels are unlikely to be achieved due to weather and route conditions. In addition, Alternatives 2- 4 require a suite of strategies that would minimize impacts on vegetation and soils, etc. They would avoid the ever increasing commercial use associated with Alternative 1 as well as the less stringent oversight of commercial activities present in that Alternative.

Page 90, 3rd paragraph, 15th line: Change “These” to “The implementation of Alternatives 2- 4”

Page 93, 2nd paragraph, last sentence: Replace with “There could be negligible to minor indirect effects on soils and vegetation associated with shuttle transportation of visitors for hiking, however most use would be expected to occur on designated trails or hardened surfaces. There would continue to be no impacts associated with firewood sales or guided bicycling.”

Page 106, 1st paragraph following bullets: Add to end: “Modifying the client to guide ratio may have an indirect effect of changing guided climbing group sizes to a mixture of nine clients and three guides to increase the summit success rate for various concessioners (because under the proposed changes to guided climbing, guides may not leave clients alone on the mountain for later pick- up.”

Page 106, last paragraph: Add the following to the end: “The following beneficial effects of increasing the number of guide services offering the same types of trips could occur, including improved services focused more on client than guide service objectives, increased or diversified quality of programming, increased cooperation among guide services such as in the sharing of route and weather conditions, heightened environmental stewardship, lower prices, and increased safety awareness. By the same token, increasing the number of guide services could also result in the following problems – inefficiency or duplication of efforts, accountability issues associated with responsible or irresponsible actions leading to a change in the potential for resource damage, inappropriate rivalry between companies leading to compromised decision-making regarding summit attempts, decreased cooperation (and therefore safe practices) during rescue efforts, etc. To the degree possible, these adverse effects would be prevented by incorporating criteria in the climbing prospectus or CUA permits that would prevent these from occurring and by ensuring that park monitors looked for these problems and brought them to the attention of the concessions specialist so that they could be stopped or avoided.”

Page 108, 6th paragraph: Add the following to the end: “Other beneficial effects of commercial free routes may include: preserving choice (primarily for independent visitors); limiting commercial overcrowding of small camps; limiting guided groups where route conditions demand smaller parties; preserving a wilderness experience for independent climbers or other wilderness users (balancing preservation with use); allowing more permits for independents, etc. Some adverse effects of commercial free areas could include that these areas limit the route choices for commercial climbers. Commercial free areas could also contribute to increased resource impacts/accidents when guides who are now an example to independents are not available. These areas offer fewer places to teach technical climbing and emergency rescue techniques and they do not fulfill the high demand for guided access. Finally, some identified routes provide the early season opportunities on the Mountain. With their designation as commercial free, these areas may increase the number of marginally qualified climbers that might attempt routes not designated for guides, thereby contributing to SAR numbers, etc. These additional potential effects of establishing commercial free areas would be most evident in Alternatives 3 and 4, where large commercial free areas are proposed.”

Page 115, 1st paragraph: Add to end “Other effects would remain the same as described above in Alternative 1.”

Page 116, 4th paragraph, 5th line: Insert”, while minor to moderate changes would occur on Other Routes. Most of” after “Kautz Routes”

Page 120, 7th paragraph, 3rd line: Insert “Concessioners would increase from two to four, while CUAs would increase from 25 (IBPs) to 93 under Alternative 2, 98 under Alternative 3, and 97 under Alternative 4.”

Page 122, 3rd paragraph: Insert the following paragraph afterwards: “The actual gain or loss in economic benefits to gateway communities would depend on the degree to which commercial businesses staged all or part of their operations in these places. While it is fairly likely that concessioners would stage their businesses out of the most consistent area for commercial operations (the west side of the park), it is also fairly unlikely that these businesses would move their corporate headquarters to area gateway communities. Because the alternatives call for increasing visitor opportunities on most climbing routes and through most Additional Services, it is likely that there would be additional local economic gains as a result of these enhanced visitor opportunities. These gains would be present in increased hiring, increased tourism dollars spent in the vicinity of the park and concomitant increases in the amount of time some people would visit the park or the frequency of those visits to take advantage of the new or expanded visitor use opportunities.

To the degree increased competition for concession and CUA opportunities affected the current concessioner or IBPs associated with the park by limiting their ability to obtain new or similar permits, these effects would also carry over to the gateway communities where these businesses reside and result in adverse effects that would parallel the extent of their reduced opportunities. On the other hand, with increased opportunities for offering climbing on the Emmons, Kautz and Other routes and in offering additional CUAs for wilderness and other types of CUAs, these opportunities would increase and there would be increased likelihood that those already providing these types of services would experience economic gains that would reverberate to the gateway communities where they were based.

Because of the prospectus process for issuing guided climbing contracts and the likelihood that CUAs would be issued through an as yet to be determined process, it is difficult to predict how the modifications proposed in the Commercial Services Plan would affect both the current climbing concessioner, as well as other IBPs associated with the park. The only measure of certainty that could potentially exist is if the current climbing concessioner did retain some right of preference associated with their current provision of commercial services, then that concessioner would likely be part of the mix of new commercial services providers under the new plan.

Page 123, 1st paragraph: Insert “Conclusion: Given that all of the proposed action alternatives offer some opportunity of enhanced program of commercial services for park visitors, whether that opportunity be in guided climbing, guided wilderness, guided alpine wilderness or additional services, it is likely that the Commercial Services Plan would result in similar enhanced economic benefits to both commercial service providers, whether new or current operators, and to local gateway communities. It is, however, difficult to identify where these enhanced economic benefits would reside, given uncertainties associated with the various administrative processes for granting new concessioner operations or CUAs.”

Page 123, 2nd paragraph: Add to end: “In addition, the ongoing increases that have been shown in the numbers of visitors participating in guided or independent climbing over time (see Table 8), as well as the long- term increases shown in visitors participating in a wilderness experience over time (see Figure 2) could, if not limited by caps on commercial activities, continue to increase over time. These increases seem related to an increase in leisure time and could result in additional minor to moderate cumulative effects on a variety of park resources where an increasing number of visitors would increase the degree of impacts.”

Attachment 2: Errata

Commercially Guided Visitor Use and Other Services Environmental Assessment

(Attach this document to the Environmental Assessment to comprise a full and complete record of the environmental impact analysis.)

Commercial Services Plan Comments

Introduction

The following section summarizes some of the issues raised by the public comment process on the Commercial Services Plan/Environmental Assessment. In particular, it offers more explanation for issues that were raised, but that were not considered substantive comments. The planning team thought that the following issues were worth highlighting to offer additional explanation or to clarify misunderstandings about the plan or park.

Camp Muir

Wilderness Issues

Some respondents thought Camp Muir should be managed as a wilderness area and that there should be no huts or caches at the high camp. While Camp Muir is indeed remote, Camp Muir is not within designated wilderness. The 1.58 acre parcel of Camp Muir was excluded from Wilderness designation. Camp Muir is a Historic District on the National Register and contains several historic structures which will continue to be maintained and preserved. Camp Muir and these structures are also part of the Mount Rainier National Historic Landmark District. These structures are an important part of the history of Mount Rainier National Park. Facilities, such as toilets, help the park manage human waste. A separate Camp Muir planning process will follow the commercial services planning process and will be focused on the future vision for managing Camp Muir.

Facilities

Many respondents also noted that Camp Muir facilities are an important part of the experience on that route and should remain. The two- day summit model, which is particularly popular with some visitors, relies on a certain amount of infrastructure to make it possible. While the foregoing is true, depending on the outcome of the Camp Muir DCP, there will continue to be facilities for guided climbing groups at Camp Muir, including group shelters or tent sites, and toilets. While some non- historic structures could be replaced with newer facilities, historic structures will continue to be preserved. The two- day guided climb, with an overnight stay at Camp Muir will continue but expedition- style trips (two and possibly three night trips with stays above and below Camp Muir) will also be added. The loss of the two- day climb was not discussed in the EA because it is possible to achieve in the proposed alternatives.

Erosion

There were a few who thought that the Commercial Services Plan should include a plan that addresses long- term erosion at Camp Muir. Although this action is outside the scope of the Commercial Services Plan, it is one of the issues proposed to be addressed by the Camp Muir Development Concept Plan.

Number of Service Providers

Monopoly Issues

Many people used the term monopoly in their comments when discussing the current concessioner and were seemingly disappointed that only Alternative 3 would have resulted in a change. While the term does have some negative connotations, historically, the NPS has preferred concessions contracts that provide a monopoly to concessioners. In reality, the

Commercial Services Plan proposes to convert a monopoly (one service provider that controls the market) into oligopolies (a few service providers that control the market). The exception to this in the plan regarding climbing is that a limited number of Commercial Use Authorizations (CUAs) will be issued to single trip guides.

In addition, the Commercial Services Plan calls for contracts, rather than CUAs for guided climbing because contracts allow the park to build long term relationships with service providers. Concessioners also operate in a more highly regulated environment than CUA holders. In general, the plan proposes using concessions contracts for those activities that require a high degree of regulation and where there is a desire to highly limit the number of service providers.

Market Conditions

Similar to the comments above, some respondents thought the NPS should let the market determine how many companies can/should be on the mountain. Many noted that there are certainly more than three viable (climbing) companies that could maintain operations in the park.

As noted above, however, the NPS has found that most often a long-term relationship with a commercial service provider results in the most effective means of resource preservation. When businesses have measures on the quality of ongoing operations to consider for maintaining their status in a park, there is more incentive to correct problems found through monitoring. Additionally, the administrative burden would increase substantially if the park needed to manage user nights and access among a larger number of commercial operators.

Multiple Guide Services and Safety

Respondents cited many beneficial and adverse effects regarding safety associated with multiple guide services operating on the mountain. Multiple guide services could result in guide services taking unacceptable risks to please clients or to increase their percentage of summits. Communication regarding weather, route conditions and rescues would be easier with one concessioner and confusing with multiple guide services. Multiple guide services could also enhance safety by communicating weather and route information and could even compete with each other based on their safe practices. Camaraderie, communication and professional cooperation which results in positive changes in the evolution of guiding techniques among guides from different companies was noted as a mountaineering community tradition.

Although many of the above could occur, multiple guide services operate on the same routes at the same time around the world. This demonstrates that there would be few, if any additional safety issues by allowing more than one guide service on Mount Rainier. A professional guide will conduct a risk assessment for their specific climbing team, regardless of other operators in the area, and proceed or turn back according to their experience and skills. In today's business world, an error made by an individual guide can place an entire company at risk. This factor further serves as incentive for guides to make conservative decisions.

Cost of Guided Climbing Experience

Respondents were divided over whether multiple guide services would increase the overhead and result in higher guided climbing costs or be forced to compete with each other and through competition lower costs. Many thought there should be a cap on the price of guided climbs.

While the guided mountaineering program will shift from one service provider to three service providers once the plan is implemented, the change in the number of service providers may or may not result in changes in the pricing structure for each concessioner. The NPS's concessions program, however, does include a rate approval component. Adequate documentation must be submitted before a concessioner can implement or change a rate for services. In other areas where guided mountaineering services compete, there does not appear to be a significant

difference between the advertised rates of the various service providers. Individual rates are generally more closely tied to the number of days that the expedition will involve.

Financial Feasibility

There were many who were unfamiliar with the financial feasibility analysis conducted on the guided climbing portion of the plan and who therefore contended that the climbing alternatives in the plan were not financially feasible. As noted, however, a financial feasibility analysis was conducted by PriceWaterhouse Coopers on both the alternatives in the draft plan and the selected alternative. Both analyses determined the climbing opportunities to be financially viable based on a study of companies providing similar services and the current concessioner's financial records.

Differences between Requirements for Concessions vs. CUAs

Respondents noted that although there would be more business opportunities in the park under the proposed plan that there is a big difference between an opportunity and a viable business model. Several noted that the proposed CUAs are financially infeasible, including the shuttles and the guided wilderness use.

As referred to in the heading for this section, there are several differences between concessions opportunities and CUA opportunities. One of the differences is whether there must be a reasonable opportunity for the service provider to achieve a profit based on the opportunity. A concessioner is generally *required* to provide a service; therefore, there must be a reasonable opportunity for the concessioner to achieve a profit. CUAs merely *allow* a service to be provided. Another difference between concession contracts and CUAs is that the rates charged by concessioners are highly regulated while the rates charged by CUA holders are unregulated.

Applicants for CUAs must determine if the service they wish to provide at the park fits within their individual business model. The opportunities offered in this plan may be too small to mesh with one operator's business model, while an incidental opportunity may fit well into another operator's business model. CUAs are generally designed to be one component of a company's business (incidental use) rather than being a significant component of the business.

In the case of the shuttle CUAs, the Commercial Services Plan is not intended to be a substitute for a park transportation plan. It is recognized that the limited opportunity provided in the plan is probably not financially viable given the short period of time to amortize start-up costs and the lack of assurance of some level of public demand for the service. The plan merely seeks to allow a business to provide the service until a transportation plan can be completed.

Continuation of Special Climbing Opportunities

Some respondents were concerned that revisions to commercial climbing would affect services provided by current concessioner such as shuttles and the Climb for Clean Air for the American Lung Association.

As noted in the plan, all of the concessioners and the CUA holders, except Step-on Guides, would be required to shuttle clients into the park as a condition of their contract or authorization, thereby ensuring that shuttles would continue. In addition, while it does not currently conform to the proposed limits for guided climbing in the plan, the Climb for Clean Air could continue under a special use permit or through the combined efforts of multiple concessioners. The climbs could also occur over a period of days to allow more people to participate in the activity.

Impact of Commercial Services Plan Implementation on Park

Many respondents were concerned about the impact on park concessions staff from implementing such a large number of CUAs. In response, the number of CUAs was reduced in

the selected alternative by combining some similar activities into one authorization and by shifting some of the proposed CUA activities to the concessions contracts. This will help simplify the administration of the plan. This also meets the following management strategy on page 11 of the Environmental Assessment

Ensure that before reauthorization of commercial services occurs that the types of authorized uses are still necessary and/or appropriate, the levels of use are consistent with resource protection and quality visitor experiences, and the commercial services program can be managed in an efficient and effective manner.

Both concession and CUA authorizations allow some fees or revenue to be used for managing them. CUAs allow for cost recovery which means that fees can be charged to the permit holders to recover the costs involved in implementing the program. The program can therefore fund additional personnel to manage the program. There is also greater flexibility in the use of franchise fees collected from concessioners. These fees can be used to manage portions of the concessions program.

Impact of Commercial Services Plan on Local Communities

Respondents cited both beneficial and adverse impacts from multiple guide services on local economies. Benefits included an increased need for land, facilities, equipment, employees, etc. as well as more companies for employees to choose from. Adverse impacts included: the unlikelihood that businesses would duplicate their infrastructure or move to local communities, and loss of employment opportunities/income for current concessioner from (the apparent) reduction in guided climbing.

This assessment was part of the PriceWaterhouse Coopers financial feasibility analysis. As noted in that analysis, while it is difficult to predict outcomes with absolute certainty, it is likely that each concessioner will have some sort of seasonal base operation in or near the gateway communities. This likelihood is based on the number of clients that each business will serve and the level of service that clients will likely demand. Corporate offices will likely remain in their current locations.

Guiding service employment levels are subject to seasonal fluctuations and it is likely that the number of employees working for each guide service will continue to decrease in the off season and increase during the climbing season. The demand for guided mountaineering services, however, is not expected to decline in the coming years (based on national outdoor recreation projections), and indeed, the proposed plan offers some opportunity for growth in guided climbing.

Perceived Reduction in Actual Guided Climbing Opportunities

Numerous respondents cited a range of expected adverse effects that would occur with a perceived reduction in guided climbing on Mount Rainier. These effects included an increased safety risk, leading to more accidents and fatalities; a reduction in the number of park advocates; a reduction in the amount of training and education provided on guided climbs, leading to a lower quality of guided climbing experience; a reduction in tourist-related expenditures; a reduction in guided climbing opportunities (perhaps leading to reservations required years in advance); an increase in pricing; increased environmental degradation; and lost jobs.

While it is true that many respondents thought that the plan proposed a decrease in guided climbing opportunities, the alternatives, in fact, increased guided climbing opportunities overall, while spreading some opportunities out over the whole summer season. The selected alternative allows a further increase in guided climbing on high use routes, retaining some of that increase during the peak season, while modifying the increases proposed for moderate use climbing routes to an experience commensurate with that designation. As the potential for guided climbing rises

to meet the limits in the plan, these effects would be unlikely. With other mitigation measures included in the plan, it is unlikely that these impacts would occur even over time.

Rationale for Setting Limits

A number of respondents were concerned with the rationale for setting limits in the Commercial Services Plan. That rationale was noted on pages 28- 30 of the draft Commercial Services Plan, namely that establishing limits for commercial services meets these goals for the Commercial Services Plan, including: commercial use should not increase significantly beyond current levels, commercial activities should not significantly detract from or lessen the experiences of independent visitors; park resources and values should continue to be protected from unacceptable impacts; etc. Establishing limits also meets the purpose and need for the plan (pages 6- 8 EA): without a plan establishing limits, CUAs would be issued to all applicants and concessioner climbing would continue to rise toward the maximum potential levels identified in the EA, with little ability to control numbers/resource impacts and with eventual, if not existing, impacts to non- guided visitors.

Independent vs. Guided Issues

Tendency for independent climbers to increase use by trailing guided climbers

Many respondents related personal experiences that illustrated problems or issues associated with being guided or independent climbers. Several also noted that the close interplay between independent and commercial use means that commercial guiding cannot be viewed in isolation as in the Commercial Services Plan and that this is particularly true on the Muir Route, including Disappointment Cleaver and Ingraham Direct, the routes taken by the overwhelming majority of summit climbers, where independents often follow in the footsteps of guided climbers.

While the plan only addresses commercial use, the issue of independents trailing commercial groups and increasing use over time was recognized by the planning team and was factored into the establishment of commercial use limits in the moderate climbing zones and on other routes and was also a key factor in designating commercial free areas.

Muir Route Maintenance (see also specific comments in next section)

In addition, while the operational details of ensuring route maintenance among several guide services have yet to be determined, the selected alternative acknowledges the unique high degree of route maintenance on the Muir Route. As a result, the prospectus for the climbing contracts will encourage bidders to identify how they would work together to protect visitors and park resources on this and other similar cooperative climbing management needs. (See also the series of Muir Route Maintenance comments below.)

Independent vs. Guided Visitor Experience

Respondents were also split regarding whether guided or independent climbing offers a safer or better experience to park visitors. There were arguments noting that both commercial and independent use had less impact on park resources, as well as dichotomies in other areas of safety and resource protection such as the likelihood of LNT training and the impact of typical group sizes.

Because there have been no studies at Mount Rainier that have sought to isolate the resource protection measures or safety aspects of independent vs. guided climbers and because respondents were nearly evenly split on these issues, no reasonable conclusion can be drawn based on evidence. Instead, as disclosed in the Assumptions section of the EA (see page 56), it is likely “that (depending on the area) the contribution to resource impacts from commercially guided groups is generally lower than . . . impacts associated with day use and non- guided visitors.”

Ratio of Independent to Guided Climbers and Safety

Some respondents thought that changing the mix of guided to independent climbers in favor of independent climbers would increase the number of SARs and that independent climbers should be more regulated or required to undergo skills assessments. Unfortunately, however, accidents strike all, without regard for experience or ability. While a skills assessment was indeed part of the history of climbing at Mount Rainier, the NPS has long since shied from determining the capabilities of park visitors by such means due to legal liability and an inability to make accurate assessments. During the climber registration process, most climbers are personally greeted and given basic resource protection and safety information. Future plans call for an introductory video for all wilderness visitors and/or climbers (such as is now employed at parks like Yellowstone). More informed park visitors may make better choices that result in fewer SARs.

Establish limits for independents

Some respondents noted that instead of or in addition to limiting commercial use, independents should be limited and wondered why this was not done.

Providing commercial services in a national park is a privilege rather than a right. Commercial services may be authorized, but not at the peril of independent visitors. All overnight wilderness visitors are currently limited by the Wilderness Management Plan. While it is not being done as part of the Commercial Services Plan because regulating independent visitors is outside the scope of the Commercial Services Plan (which applies only to commercial use), it is likely that independent visitors will be further limited by future revision of the Wilderness Management Plan and/or future analysis of carrying capacity.

Establish Volunteer Maintenance or Gateway Community Location Requirements for CUAs or Concessioners

Some respondents thought that CUA holders or concessioners should be required to perform a percentage of simple, easily monitored volunteer projects in either the front or backcountry.

While this would indeed benefit the park, requiring commercial service providers to volunteer their time or the time of their clients cannot legally be a requirement of issuing a commercial use authorization or concession contract.

Similarly some respondents thought that during the bidding process, some weight should be given to guide services willing to locate in Ashford and other gateway communities or that concessions should be split among locally based and international climbing firms. One of the required submittals in the prospectus process is a detailed response concerning how the potential bidder would operate their business. As a result, it is likely that those bidders wishing to minimize their client travel time and expenses will likely naturally choose to stage their operation out of one of the park's gateway communities, especially on the west side of the park, where most activities occur. Unfortunately, splitting concessioners among local and international firms cannot be a part of the decision process for evaluating offers.

CUA Distribution, especially for Single Trip Guides

Many potential commercial services questioned or commented on how CUAs could be distributed. Among the methods suggested included a lottery, a rotation, a first- come first-served set- up and details about how the announcement should occur. The determination of the distribution of CUAs, including for Single Trip Guides will likely be a lottery, however the national regulations for CUAs have not been finalized. As noted in the revised plan, it is likely that six permits for Single Trip Guides would be issued each year until the eighteen have been given, pending minimal problems encountered in implementation of this new activity.

Commercial Services Plan Planning Process

Some respondents felt that the commercial services planning process was rushed by the expiration of the current concessioner's contract and the moratorium on IBPs and that it should have included wider public participation. Comments included that the public meetings were not well- advertised or attended; that the public process should have included climber surveys and more scoping; and that the planning team should have been comprised of government and public officials as well as members of the general public.

The rationale associated with the above comments is not supported by the process. Approximately 200 people attended the public review meetings. Over 1,900 written comments were received from the public and businesses from the region, across the nation and from the international community. Twenty three articles appeared in the media in national, regional and local publications. Four press releases have been issued since the plan was released. There has been more public participation in this planning effort than in any other planning effort managed by the park to date.

While the expiration of the current concessioner's contract and the moratorium on new commercial activities were factors in motivating the park to proceed with the planning process, the current concessioner's contract has been extended multiple times and will likely be extended until the planning process is completed. Additionally, the moratorium has been extended until the completion of the planning process. The planning process, which has lasted nearly 3 years, was not rushed and great efforts have been made to understand (and to the degree possible to respond to) all viewpoints.

Concerning the interest in including the public and non- park governmental entities in the planning process, *The Federal Advisory Committee Act* prohibits the park from including members of the public on planning committees unless we receive Congressional or National Park Service approval. Rather, the direction given is to conduct public scoping meetings and public review meetings during the planning process. Certain governmental agencies, such as those with regulatory roles, are consulted as a matter of routine during the planning process.

There were also more comments on the inadequacy of the public scoping period. Some respondents mistakenly thought that public comments were limited to local voices and contained limited views. This was also not supported by the actual process. Unlike most Environmental Assessments, which have a public review period of 30 days, the Commercial Services Plan EA had a 90- day public review period. The public scoping period included four public meetings and the opportunity to provide public comments via the internet, faxes and standard mail delivery. While many of those who participated in the public scoping meetings were indeed from the region surrounding the mountain, those who participated in the public comment process represented all fifty states and many foreign countries. Comments from both processes have been used to influence the selected alternative and other aspects of the Commercial Services Plan.

Shuttles

Potential clientele

Shuttles should be targeted for unguided climbers and multi- day backpackers. These groups represent some of the very best potential shuttle clientele due to their small party size and lack of need for transportation during the stay, other than for trailhead access. While this idea was considered in the draft General Management Plan, it did not become part of the final selected alternative. It is outside the scope of the Commercial Services Plan. This does not preclude, however, current or proposed shuttles from targeting this user group in advertising.

Viability

A variety of suggestions for making shuttles work were given, including restricting automobiles; instituting regular shuttles; offering incentives to multi- day backpackers and climbers such as

abatement of user fees, entrance fees or preferential access; and mandatory use for some user groups.

These alternatives and more were considered in the park General Management Plan and were deferred until the park completes the more detailed transportation plan noted in the Commercial Services Plan (see pages 26, 33 and 65 in the Draft Commercial Services Plan). While incentives or subsidization will very likely be employed, these suggestions are outside the scope of the Commercial Services Plan.

Single Trip Guides

Many respondents thought that Single Trip Guides would offer a much greater level of choice for guided visitors, allowing clients to climb with guides they trust and know to be safe and technically skilled. In reality, however, while Single Trip Guides will offer a choice to some visitors, the limited number of permits will mean that most visitors desiring a guided climb must select from among the concessioners instead. Concessioner limits allow the flexibility to accommodate a range of requests for different guided climbs.

Native American Awareness

The Muckleshoot Indian Tribe noted that commercial services (and park) employees should receive orientation to the importance of the Native American relationship with the mountain. This will be part of the Commercial Services Plan selected alternative, which identifies an enhanced requirement for commercial services employee orientation to the mission of the National Park Service and to Mount Rainier National Park management objectives. It also requires that commercial services providers pass on this Leave No Trace information to their clients.

Impact of Establishing Multiple Guide Services

Respondents were divided on the advantages and disadvantages of multiple guide services. Those who had positive experiences with the current guide service or positive experiences with national or international competitors of the current guide service were among those who commented on the expected impacts to visitor experience with multiple guide services. The most often cited benefit was an increase in the quality or type of services offered by concessioners. Disadvantages included increased costs, reduced access and increased risk. (See other guided climbing responses above and the Camp Muir comment responses for a more detailed discussion of the identified advantages and disadvantages of multiple guide services.).

As noted in other responses, multiple guide services operate on the same routes at the same time around the world. The park's experiences with multiple guide services operating on the same route (Emmons) and in the company of independents on all routes have been mostly positive. Public comments on the plan note cooperative relationships between multiple guide services occurring in other parks and on other mountains, in the United States and around the world. Sixty one percent of those who commented on multiple guide services and their potential relationship to each other cited successful working relationships. While there are indeed benefits of multiple guide services, with the implementation of the selected alternative the park will be monitoring closely for potential adverse effects.

Westside Road Issues

A number of respondents identified issues regarding the Westside Road and the proposed commercial shuttle operation that had previously been addressed in the park General Management Plan, including the desire to close the road to commercial use; support for winter grooming of the road to take pressure off the Paradise snowplay area; and reopening the road for public vehicular access.

Commercial Services Plan – Errata for the Environmental Assessment

The General Management Plan evaluated these options and more regarding shuttles both throughout the park and regarding the proposed operation on the Westside Road. The selected alternative in the General Management Plan was to open the Westside Road to a commercial shuttle operation and to keep it closed to private vehicles due to ongoing high flood hazards. That action will be partially facilitated by the selected alternative in the modified Commercial Services Plan.

Attachment 3: Errata
Commercially Guided Visitor Use and Other Services Environmental Assessment

(Attach this document to the Environmental Assessment to comprise a full and complete record of the environmental impact analysis.)

Commercial Services Plan Comments and Responses

The following comments and responses are arranged via topic area alphabetically as follows:

Additional Services Alternatives	Limits Guided Climbing
Air Quality	Monitoring
Camp Muir	Muir Route Maintenance
Camp Schurman	Muir Snowfield
Carrying Capacity	Permit Allocation
Commercial Free Areas	Plan/Planning Process
Competition	Purpose and Need
Disperse Use	Resource – General Cultural
Feasibility – Physical/Operational	Resource – General Natural
Gateway Communities/Socioeconomics	Resource – Wilderness
Group Size	
Guided Alpine Wilderness Alternatives	Shuttles
Guided Climbing Alternatives	Single Trip Guides
Guided Climbing Reduction	Step- On Guides
Guide Reduction	Training/Orientation
Guided Wilderness Alternatives	Wilderness Management Plan
Independent vs. Guided	

ADDITIONAL SERVICES ALTERNATIVES (20 comments)

AS1) Comment: Include a “pass through” provision to enable commercial entities other than the current food, lodging and gift services concessioner to use Longmire, Paradise or Sunrise as a starting point for winter guided trips.

AS1) Response: The current concessions contract with Guest Services, Incorporated (GSI) contains a clause that limits the ability to authorize other non- concession service providers to offer activities within a ¼ mile radius of the developed zones where GSI currently provides services similar to the ones authorized in the concessions contract. GSI provides guided winter activities within the developed zone at Paradise and rentals at Longmire. There may or may not be an ability or need to create a pass- through provision.

AS2) Comment: Increase the number and change the array of guided bicycling CUAs to meet visitor demand and to create feasible opportunities for interested businesses.

AS2) Response:

While the number of CUAs allowed has increased slightly from two to five (over no action), the number of trips allowed for each CUA will remain two. This relatively low use level is primarily a result of safety issues associated with the park’s historic roads and both the greatest demand for this service and the greatest demand for traveling park roads occurring simultaneously during the busy summer season. As indicated in the Commercial Services Plan, park roads are narrow and often steep, with many blind curves and few pull- outs or passing zones. While wider roads could

accommodate more use, park roads will continue to be preserved for their Mount Rainier National Historic Landmark District characteristics, including travel lane width.

AS3) Comment: Make mountain circumnavigation trips part of the climbing concessions rather than unrelated CUAs.

AS3) Response:

In the selected alternative, the former mountain circumnavigation category has, in fact, partially been given to climbing concessioners, however instead of continuing to identify the trip as a circumnavigation, the selected alternative allows concessioners (and CUAs) to conduct an extended winter trip anywhere on the mountain (outside of the commercial free zones), therefore offering a greater degree of flexibility for both visitors and businesses.

AS4) Comment: Camp Muir Winter Guides should have access to the facilities at Camp Muir.

AS4) Response: Under the selected alternative, instead of remaining in Additional Services, the Camp Muir Winter Guides (from the preferred alternative) have been given partially to concessioners and partially to Guided Wilderness – Winter CUAs. As noted below, the client shelter used by the current concessioner is owned by the current concessioner and cannot be conveyed by the park to another concessioner or business and for reasons of liability likely cannot be used by them either. As a result of this and the failure of the structure to meet current building codes, it was proposed for removal in the Commercial Services Plan. Although this shelter may not be available to other concessioners immediately following the approval of the Commercial Services Plan, concessioners, like other Camp Muir visitors will continue to have the ability to use tents (as well as emergency use of the Camp Muir Public Shelter, if needed). The Camp Muir DCP process will determine the future availability of other facilities, including sleeping facilities or platform tents, for both the guided and non-guided public.

AS5) Comment: Guided winter seminars to Camp Muir should be allowed a summit attempt.

AS5) Response: While each concessioner will have the opportunity to provide winter seminar summit attempts via Camp Muir, the originally proposed Camp Muir Winter Guides (in the preferred alternative) has been modified to allow an unspecified winter overnight trip (which may still include Camp Muir). Three of the original five CUAs, proposed in the preferred alternative, are now part of the guided climbing concession proposal and the other two remain non-summit oriented trips provided by Guided Winter Wilderness CUAs. Summit attempts are only authorized through the concession contracts and Single Trip Guide CUAs.

AS6) Comment: Make day use CUAs part of concession opportunity.

AS6) Response: Some proposed CUA activities from the preferred alternatives have been shifted to the guided mountaineering concessions contracts as a result of the public review process and internal analysis. Fewer CUAs will reduce the park's administrative burden for their management and provide an enhanced opportunity in the concessions contracts. The activities shifted to concessioners are primarily those requiring technical skills, similar to the ones already possessed by these service providers. The remainder of the commercially guided activities will continue to be authorized through the CUA process. Allowing a variety of commercial operators to provide guided services at the park will achieve the goal of providing guided clients with a choice of service providers for similar activities.

AS7) Comment: Guided day hiking, which has limited administrative needs, should be encouraged to increase visitor education.

AS7) Response: The plan attempts to achieve a balance between providing greater access to the park for commercially guided visitors and ensuring that increased commercial use doesn't result in adverse impacts to park resources. The next few years will provide the park with baseline data on the demand for commercially guided hiking, areas of interest to commercial guides, and information on the actual beneficial and adverse impacts resulting from guided use. Once the baseline data is collected and analyzed, a better determination can be made concerning the appropriate level of use. As noted in the plan, the use levels proposed for new activities are moderate and interim.

AS8) Comment: The impact of guided bicycling trips on traffic issues has been overestimated.

AS8) Response: While it is true that good guides can guide safe trips, the park has erred on the side of safety to avoid micromanaging permits based on allowable conditions. As with other activities, this activity would be monitored and the number of cyclists could increase or decrease based on this monitoring.

AS9) Comment: Severely limiting and combining educational groups amongst commercial outfitters does not address the positive impact that these educational groups can have on the future of the park and environmental conservation.

AS9) Response: One of the issues that the plan is unable to resolve at this point is the exemption from the CUA process for non-profit organizations. While CUA limits have been established in the Commercial Services Plan for various commercial educational opportunities, limits have not yet been established for activities provided by non-profit organizations. Many educational groups are organized as non-profit institutions and will likely seek approval for their activities through an alternative process (Special Use Permits and similar authorizations). Anticipating this, in the selected alternative, some guided alpine wilderness opportunities have now been given to concessioners and others proposed for non-profits.

AIR QUALITY (15 comments)

AQ1) Comment: Reducing guided climbing will increase traffic to Paradise (by increasing the number of single vehicle trips) which will adversely affect air quality and consume limited parking there.

AQ1) Response: Although there was a widely circulated misperception about the Commercial Services Plan, namely that it would reduce the number of guides and guided climbers, guided climbing levels will be able to reach their highest actual levels following implementation of the plan. In addition, the plan retains the requirement for not only guided climbers, but all guided visitors to be shuttled, thereby reducing additional potential adverse impacts to air quality.

AQ2) Comment: Increasing the number of commercial guide services using unregulated shuttles would adversely affect air quality.

AQ2) Response: The park planning team for the Commercial Services Plan, like the General Management Plan Planning Team before it, considered a suite of requirements that would increase the beneficial effects of requiring shuttles for some visitor transportation needs, including the shuttle's physical capacity and fuel type. These additional requirements, however, were considered but rejected due to the inability of the Commercial Services Plan to do more than take preliminary steps toward implementing parkwide shuttle goals in the General Management Plan. In fact, although shuttles have been determined, through some initial planning, to be most likely viable only through a concession or procurement contract, the Commercial Services Plan was unable to offer more than CUAs for shuttle operations due to the

high degree of uncertainty about the financial viability of shuttles (a requirement for concessions contracts) or available funding (a requirement of a procurement contract).

CAMP MUIR (155 comments)

CM1) Comment: Suggestions were made to both eliminate structures (particularly the Gombu shelter) or to add other structures at Camp Muir. Proponents of eliminating facilities cited the aesthetics or physical condition of these buildings, while proponents of additional structures cited the benefits to the outlying areas of Camp Muir and the advantages of concentrated use (such as fewer tent platforms) to limit resource impacts from repetitive, moderate or high intensity use.

CM1) Response: Since it cannot be conveyed to another concessioner, the Gombu/client shelter, presently used for housing guided RMI parties, was proposed for removal (as noted in the analysis on page 103 of the Environmental Assessment). It will likely be removed at the end of the current concessioner's contract. Depending on the outcome of the Camp Muir Development Concept Plan, the shelter may be replaced when one of numerous alternative designs now being considered is chosen and funding is secured (see Environmental Assessment page 102) or it may be replaced with tent platforms. If constructed, new facilities would be in harmony with the historic structures and would meet current building codes (unlike the Gombu/client shelter). Focusing overnight concessioner use within a structure would continue to allow independent visitors tent space elsewhere on or adjacent to the Muir Cleaver and would better ensure the use of the human waste facilities, minimizing resource impacts. No matter which option is selected, the goal would be to continue to concentrate camping primarily onto the Muir Cleaver in a way that preserves wilderness values outside of the non-wilderness Camp Muir enclave.

CM2) Comment: Many specific suggestions were made regarding how to use various facilities at Camp Muir. Some respondents requested that no additional facilities be added at Camp Muir to accommodate multiple guide services or wondered how multiple guide services would not require additional facilities.

CM2) Response: No facilities would be added through the Commercial Services Plan to accommodate multiple guide services. The proposed contracts are not intended to be facility based, although temporary concessioner shared use of the guide shelter (cookhouse) will be available. The Camp Muir Development Concept Plan, however, will address the possible need for additional facilities at Camp Muir which may or may not be used by concessioners, depending on the outcome of that plan. The decision on whether to construct additional facilities is dependent on both NPS and public needs and preservation of the Camp Muir Historic District. It will need to balance the vision of Camp Muir, the style of climbing experience offered through Camp Muir, and the issue of concentrating high use at the camp rather than spreading out into adjacent Wilderness.

CM3) Comment: Multiple guide services at Camp Muir would create operational problems by different ideas on how Camp Muir should be managed or inefficiency by duplicating services. How will the water system, toilet and communications systems be managed and how will concessioner ideas be addressed?

CM3) Response: Under the selected alternative, guide services will use and pass through Camp Muir on both the same and different types of climbs. Multiple guide services at Camp Muir would not overload existing structures because total limits on clients and guides per night will continue to be the same as before and each service would operate on a pre-determined schedule (including rotating through overnight camps). As a result, the total nightly limit of guides, clients, and independent climbers will not exceed the existing limit of 110 persons. Operational

coordination among the guide services is expected to succeed as it does on other mountains. Because of the public water system requirements being implemented on the state and federal levels, the existing propane- assisted snow- melt concessioner water system will be terminated and individual climbers or climbing parties will be expected to provide their own water. Other systems can be operated simultaneously (radio communications) or co- used (toilet).

CM4) Comment: Remove all gear and equipment from Camp Muir during the off season.

CM4) Response: Irregardless of the selected alternative, some winter storage of NPS and concessioner equipment would be necessary to respond to emergency and maintenance needs. The need for any additional winter use and storage facilities will be addressed through the Camp Muir Development Concept Plan.

CM5) Comment: Camp Muir should be managed as a cooperative. Multiple guide services could share the operation of facilities and would be cooperatively held responsible for facilities and route maintenance. Guide services could share existing facilities and services and pay a fee that supports camp operations or a single service in charge of the operation of these facilities and services. On any given day, each guide service could have guides dropped off on the way down to do route maintenance and needed work at Camp Muir.

CM5) Response: Management practices at Camp Muir and on climbing routes, particularly the Muir Route, will likely need to be fluid so that they can be adjusted as circumstances warrant. As a result, they will be articulated in the climbing prospectus and then translated into the contract operating plan for each concessioner – a document that can be modified annually. The level of activity on the climbing route and at Camp Muir will require the selection of concessioners who will, through necessity, be able to work cooperatively to serve park visitors and park resources to carry out the park’s mission.

CM6) Comment: Multiple guide services would diminish accountability at Camp Muir regarding management and maintenance of water, propane, solar and radio communications systems, as well as the route itself.

CM6) Response: The revised version of the Commercial Services Plan clarifies future management of Camp Muir. As noted above, it has become evident that operating a water treatment system that serves more than 24 people is unfeasible at Camp Muir given the changes in surface water treatment rules that affect the provision of drinking water. Therefore, to comply with the rules for producing potable water, individual climbers or climbing teams will need to produce their own drinking water rather than using a central facility.

The selected alternative also provides for non- facility based trips and calls for removal of the current concessioner- owned client shelter (Gombu). This will reduce the need for interior lighting, dependent on solar panels. Communications between teams in the field and their base of operations could either occur through the use of two- way radios, cellular phones, or satellite phones. Access to park frequencies is currently provided to commercial climbing parties for emergencies.

Public comments on the plan note cooperative relationships between multiple guide services occurring in other parks and on other mountains, both in the United States and around the world. Sixty one percent of those who commented on multiple guide services and their potential relationship to each other cited successful working relationships.

CM7) Comment: Eliminate helicopter flights for maintenance or resupply of Camp Muir concessioners but continue to allow helicopters to supply the bulk propane necessary to fuel the existing “public non- community transient” water system.

CM7) Response: When the existing Camp Muir water system is closed, pending the implementation of the Commercial Services Plan, the need for large propane bottles for concessioner operations is virtually eliminated. All guides and clients will be expected to backpack food, fuel, and equipment to and from Camp Muir and other areas. Helicopter use at Camp Muir will then be generally limited to annual supply and removal of human waste barrels, facility construction support and emergencies. Although Camp Muir itself is a non- wilderness enclave, it is recognized that flying helicopters to and from Camp Muir impacts wilderness users elsewhere. One goal of the plan is to preserve these wilderness values.

CAMP SCHURMAN (4 comments)

CS1) Comment: Build a climber/client bunkhouse at Camp Schurman.

CS1) Response: While constructing a bunkhouse at Camp Schurman is indeed possible because of its exclusion from Wilderness (similar to Camp Muir), doing so is outside the scope of the Commercial Services Plan. In addition, although the Commercial Services Plan does allow use of the Emmons Route to build to the “moderate” zoning identified in the General Management Plan, there is no intention to change the expedition style climbing experience offered by this route as it passes through Camp Schurman. A key tenet of the plan is that different climbing routes should offer different experiences to park visitors.

CARRYING CAPACITY (22 comments)

CC1) Comment: Carrying capacity analyses are necessary to provide a sound, rational, defensible change in limits.

CC1) Response: The General Management Plan called for a carrying capacity study to be completed within 5 years and the results of that study will be used, if necessary, over time to modify the interim limits (see page 88 in the Environmental Assessment) set by the Commercial Services Plan. As disclosed on pages 56- 57 of the Environmental Assessment, until then minor adjustments to use limits would continue to be made.

CC2) Comment: The need for changes in limits to guided climbing should have been identified in a new or amended Wilderness Management Plan. The Commercial Services Plan is out of sequence.

CC2) Response: Overnight use limits were originally based on existing use and an understanding of the physical carrying capacity of camps, cross- country zones and alpine areas. These are the limits that were articulated in the Wilderness Management Plan. Over the years since its adoption, subsequent use limit adjustments have been made to address specific issues of concern. Until funding is secured for the General Management Plan carrying capacity study and the study completed, use limit adjustments would continue to be made based on best available science and staff professional judgment. The use limits proposed in the Commercial Services Plan, should as noted, be considered interim, pending completion of carrying capacity studies.

CC3) Comment: An interim use limit that allows reasonable growth should be set on commercial use pending resolution of carrying capacity studies.

CC3) Response: As noted above, the limits defined in the Commercial Services Plan /Environmental Assessment are interim use limits and do allow more use that is currently occurring. Language on page 88 of the Environmental Assessment, for example, specifically states

this intent: “Define an interim maximum allowable use for commercial services in Mount Rainier National Park that will be in effect until revisions to this plan, the Wilderness Management Plan or until carrying capacity studies have been completed.”

COMMERCIAL FREE AREAS (467 comments)

CF1) Comment: Commercial free areas provide an opportunity to preserve the park wilderness experience of solitude, as well as an opportunity for independent climbers to climb away from commercial groups.

CF1) Response: As noted by the comment, commercial free areas are an important component of the Commercial Services Plan and are intended to offer visitors a wide range of wilderness experiences, better ensuring that all visitors will be able to experience the wilderness character of Mount Rainier to their personal expectations. Because commercial services can obtain wilderness permits in advance of the public and commercial use limits have been established, commercial free areas ensure that independent climbers will not have to consistently compete with commercial groups. Commercial free areas also ensure that commercial use will not dominate all areas of the park’s wilderness and that flexibility is retained for future park managers.

CF2) Comment: The effects of commercial use on independent climbers and solitude are a result of party size, not guiding. Guided climbing parties look just like recreational parties of the same size. A party led by a trained/certified guide will be one of the most highly qualified parties in any given area and because of CUA or concession requirements will have the least impact.

CF2) Response: Although a commercial party may, in fact, look like an independent party of the same size, in reality, they are not the same and without express authorization for commercial activities, they are prohibited in the park. While decreasing group size may ensure that some visitors experience solitude, the provision of commercial free areas has a different intent – that of preserving some areas free from commercial use.

CF3) Comment: Commercial free areas will become more important as pressure to use the northern and western sides of Mount Rainier builds.

CF3) Response: To acknowledge this and other factors, commercial free areas have been both retained and expanded in the selected alternative.

CF4) Comment: Many respondents provided comments on which routes should be commercial or commercial free. Named routes included: Liberty Ridge, Tahoma Glacier, Ptarmigan Ridge, Kautz Finger, Kautz Route, Fuhrer’s Finger, South Mowich, Mowich Face, Mowich Headwall, Sunset Ridge, Sunset Amphitheatre, Puyallup Cleaver, Tatoosh Range, and Willis Wall. By far the most respondents identified Liberty Ridge, and most were in favor of commercial use on that route.

Some reasons cited for commercial free routes included: preserving choice, limiting overcrowding of small camps; the existence of route conditions that are unsafe for large parties; preserving a wilderness experience for independent climbers; minimal existing use by commercial climbers; balancing preservation with use; allowing more permits for independents, etc.

Some reasons cited for allowing commercial use included: preserving choice; preserving the ability for guided climbers to improve their skills and to experience new/classic/challenging routes; fewer resource impacts/accidents because guides are an example to independents and because guides have Leave No Trace training; the potential for more accidents from marginally

qualified climbers giving it a try without a guide; the opportunity to learn technical climbing and emergency rescue techniques; high demand for guided access; all routes should be available to everyone; some identified routes provide early season opportunities; people seeking solitude can go elsewhere; etc.

CF4) Response: While there were many arguments both for and against specific commercial free areas, the overriding decision point in designating commercial free areas had more to do with National Park Service philosophy and the long-term preservation of park resources and values, including the visitor experience, than operational pros and cons. Some of these potential effects, however, have been incorporated into the discussion on page 108 of the Environmental Assessment. Recognizing that not all viewpoints can be satisfied, the NPS believes that the plan offers a balanced approach to commercial and non-commercial use and zones.

CF5) Comment: There are a minimal number of guided climbing parties on proposed commercial free routes. Banning commercial climbing accomplishes almost nothing given low current use.

CF5) Response: As noted above, commercial free areas are important in the overall management of Mount Rainier National Park. Because of their low commercial use, designating these areas should also have minimal impact on guided climbers since current use indicates only a small number of guided climbing parties in these areas. Flexibility in preserving these areas honors the plan's goal of providing a diversity of choice and experience opportunities to the public. And as noted above, by not fully allocating all possible use in all possible areas of the park, it retains management flexibility for the future.

CF6) Comment: Without guided groups, resource protection will be compromised in commercial free areas. The majority of guides are Leave No Trace certified and guided groups are held to a higher standard. They protect fragile environments and influence the behavior of other users.

CF6) Response: While some guided groups do, in fact, influence the behavior of other guided groups or independent climbers regarding Leave No Trace, there are also many individuals with the same certifications, acquired either through experience or training, who will also continue to influence the behavior of others in the commercial free areas. As noted above, however, other holistic aspects of resource preservation were more influential in the designation of commercial free areas. Designating commercial free areas preserves the park's options for managing commercial activities in the future.

CF7) Comment: The park already regulates use of alpine zones through the Wilderness Management Plan. The same criteria should apply to all members of the public, whether guided or not.

CF8) Response: Use limits simply regulate the overall number of people in alpine zones in an effort to preserve resources and offer a wilderness experience. As mentioned elsewhere, use limits in the Wilderness Management Plan were derived only from physical carrying capacity and do not differentiate between commercial and independent visitors. Additional factors must be considered with regard to commercial use. These factors include the NPS mission, whether the commercial service is necessary and appropriate in all areas of the park, the inherent advantage of a commercial entity obtaining wilderness/climbing permits, and the associated change in use patterns of guided routes that result from the provision of commercial use.

CF9) Comment: Respondents proposed a variety of alternatives to commercial free areas, including commercial free times; rotating routes designated commercial free; limiting group size rather than identifying commercial free areas; additional limits on guided climbs/number of groups in these areas; limiting commercial climbing during peak periods (such as July and

August); identifying keystone or classic routes of all difficulties as commercial and commercial free; and changing the ratio of clients to guides for more difficult routes; etc.

CF9) Response: Many of these strategies are, in fact, present in the plan. In addition, the plan proposes a variety of tools for determining where, when and how commercial activities may occur within the park. On the Wonderland Trail, commercial free times have been created in the months of July and August. The Kautz, Emmons and Liberty Ridge routes will remain commercial free on Fridays and Saturdays. The area between Success Cleaver and Ptarmigan Ridge will remain commercial free year round. On some climbing routes, party size will be limited to 12 clients and guides while other areas will be limited to 5 clients and guides. For climbing and similar high elevation activities on glaciers, client to guide ratios are lower than those in low elevation areas. Rotating commercial and non-commercial use was considered but rejected on philosophical grounds and because it would be difficult to manage.

CF10) Comment: Commercial use should not be restricted on weekends.

CF10) Response: This action was considered but rejected by the park during the planning process. The level of commercial activity that could occur, through the implementation of this plan, is higher than that currently occurring. The plan seeks to ensure that independent parties are not significantly hindered in their attempts to obtain reservations for overnight use. Independent weekend visitation is generally higher than weekday visitation and the limited weekend commercial use restrictions proposed by the plan are one tool that may help to shift some commercial visitation to periods of lower use, thereby ensuring a better experience for all.

CF11) Comment: All guide services should be allowed to guide any route at any time.

CF11) Response: Because commercial free areas were determined to be an important component of the Commercial Services Plan, this idea was considered but rejected in the planning process. As noted above, offering a range of wilderness experiences ensures that all visitors will be able to experience the wilderness character of Mount Rainier to their personal expectations.

CF12) Comment: What is the rationale for commercial free areas? What were the criteria used to select these areas?

CF12) Response: National parks are commercial free zones. By law, commercial activities must generally be specifically authorized by the park before they can occur. A compelling argument must be made to allow commercial activities to occur rather than to maintain or reinstitute a commercial free status. The plan proposes a variety of tools for determining where, when and how commercial activities may occur within the park.

The areas and periods selected for allowing commercial use were based on current visitor use patterns. For climbing, areas were selected that would provide a mix of moderate to challenging routes for both the commercial free and commercial use zones and areas that would be easy to manage. Commercial free times and dates were selected to reflect periods when commercial activity should be shifted away from peak demand so that independent use could be better accommodated.

CF13) Comment: There should be less commercial activity in the park.

CF13) Response: In allowing commercial use in national parks, park managers strive to achieve an appropriate balance of commercial and non-commercial use. While the plan does authorize commercial activities to occur in many areas where they have previously occurred, it also formally establishes commercial free zones, areas where no authorizations for commercial services will be

permitted. In addition, the plan establishes limits on the levels of commercial use, limits which have only recently existed as a result of the current moratorium on new commercial services, and which have not previously been established for most pre-existing activities.

COMPETITION (1,230 comments)

C1) Comment: Many respondents noted benefits of competition, including: improved services focused more on client than guide service objectives; increased quality of programming; diversified programming; increased cooperation among guide services such as in the sharing of route and weather conditions; heightened environmental stewardship; lower prices; and increased safety.

Other respondents cited the following adverse effects of competition among guide services, including inefficiency; accountability problems; smaller guide services with fewer resources; encouragement of low bidders; decreased quality of experience; potential resource damage; animosity between companies; compromised decision-making about summit attempts; decreased cooperation during rescue efforts; and decreased safety.

C1) Response: As noted in Attachment 1 of the Errata, the Environmental Assessment has been modified on page 106 to reflect these additional beneficial and adverse effects of competition. One of the goals of the planning process was to provide a choice of services to the public, particularly in the climbing realm. Different companies provide different experiences for their clients. Rarely is there one guiding style that meets the needs of all clients.

There are both positive and negative attributes to increasing the number of companies providing services at the park. The prospectus process for the guided mountaineering concessions contracts, however, will seek to determine who the best service providers are by determining their skills, abilities and knowledge for providing services to clients, protecting resources, and meeting park management goals by requesting this information from companies submitting offers for the contracts. The financial return to the park is generally subordinate to all other considerations in the selection process. As noted earlier, concessioner selection criteria will necessarily identify those who would be able to cooperate to serve park visitors and protect park resources while carrying out the park's mission.

C2) Comment: The current business model (two-day summit climb) is problematic. It is a one-shot opportunity with little opportunity for acclimating to the elevation. Much depends on the day's weather and the success of the group is affected by interactions with other climbing parties. This model would continue to force multiple operators to run as many climbs as possible during the short climbing window.

C2) Response: The intent of multiple guide services is to offer a choice to the public, not only in the guide service, but also in the type of experience. Rather than being too prescriptive, efforts were made to let market demands dictate the services offered. The proposed revision to the Commercial Services Plan allows for a variety of guided climbing opportunities, including the current two-day model, a three-day climb, and expedition/seminar climbs, to occur on the Muir Route, and allows an increase in the number of four-day climbs to occur on the Emmons and Kautz routes.

C3) Comment: What is the mechanism for the National Park Service to orchestrate the division of responsibilities and minimize accountability problems among multiple guide services on the same route?

C3) Response: Mount Rainier is unique in that the Muir Route is highly maintained and will likely continue to be so. While it is likely that multiple concessioners will follow very similar routes between various camps and the summit, it is not the goal of the park to have a highly maintained route for each area. It is, however, one of the park's goals to determine what routes should be maintained and to what degree and to identify and select concessioners who will be able to work together cooperatively rather than as adversaries. Finding out how companies would work together to minimize effects on the public will likely be a key consideration in the prospectus process. Park staff will continue to be responsible for monitoring the activities of the concessioners and for evaluating their performance.

C4) Comment: The plan's concentration of guided climbing activities on the Muir Route would have adverse effects on independent climbers.

C4) Response: The Muir corridor was designated as a high use climbing route in the recent General Management Plan. There will be no major adverse effects on independent climbers as a result of this plan. The overall use limits in the Muir corridor have not changed.

C5) Comment: What is the rationale for the number of concessioners proposed?

C5) Response: The planning team analyzed the physical/operational effects of from one to five concessioners and found that due to wilderness camp and route limitations, including the desire to minimize the effect of commercially guided climbers on independent climbers, that up to five concessioners would work on the Muir Route, while two or three would work on the Emmons, Kautz and Other Routes. The alternatives proposed from one to five concessioners. In the selected alternative, three concessioners are considered optimal, considering plan goals of choice, operational limitations, and the fiscal viability of the business opportunities.

C6) Comment: Whether there are equal or unequal allocations on the major climbing routes offered as part of the alternative, the Commercial Services Plan does not provide an incentive for guide services to excel, a natural benefit of competition.

C6) Response: The prospectus process will seek concessioners who are motivated to provide outstanding customer service; lead efforts to protect the environment; and who seek to exceed the operational goals laid out by park management. The concessions evaluation process (implemented once the concessioners are selected) will serve to monitor the performance of concessioners and to motivate concessioners to excel. Concessioners who are unable to meet the park's expectations may have their contracts terminated. Competition among multiple operators is expected to provide incentives towards excellence.

C7) Comment: All guides with appropriate certification should be allowed to guide on Mount Rainier. Guiding on Mount Rainier should not be limited to concessioners or a few single trip guides.

C7) Response: The park wants a long term relationship with certain types of service providers (such as guided mountaineering companies). Concessioners operate in a highly regulated environment that ensures the park will have a reliable method for monitoring customer service, the protection of the environment and the fulfillment of park objectives. Because it has a much shorter term (1- 2 years), the Commercial Use Authorization (CUA) process does not provide the same level of protection for park objectives as the concessions program. The plan does, however, propose to experiment with a limited permit system, outside of the concessions realm, for climbing guides meeting appropriate standards (Single Trip Guides).

DISPERSE USE (14 comments)

DU1) Comment: The Commercial Services Plan should disperse current use among different services and routes, while limiting group size, thereby dissolving large groups that create bottlenecks on major climbing routes.

DU1) Response: Commercial use will occur primarily in the high and moderate use climbing zones as defined in the General Management Plan. The proposed limits in the Commercial Services Plan will ensure that party size is limited to twelve clients and guides on the Muir, Kautz and Emmons routes and five clients and guides on other routes. Guide services will be required to stagger starts, which should help to disperse use and minimize bottlenecks. In addition, each guide service has the flexibility to offer a variety of climbs.

DU2) Comment: Concentrating use would preserve the vast majority of the park from heavy and potentially damaging use.

DU2) Response: Concentration of users is more often the result of individual preference than agency design. For example, most climbers prefer well- known standard routes over lesser-known, more difficult ones; most hikers prefer staying on trails over traveling cross- country. Individual choice alone often helps to preserve the more pristine areas of the park. In sensitive areas subject to potential overuse, park visitors are prohibited from leaving the trail. The NPS role is to set and manage use limits to prevent overcrowding and resource damage. As noted above high and moderate use climbing zones as well as a variety of trail zones were designated in the General Management Plan. The selected alternative in the Commercial Services Plan further concentrates commercially guided parties in those areas where it has been determined to be both necessary and appropriate (as outlined in the commercial use guidance in NPS Management Policies) leaving a wide area of the western and south sides of the mountain commercial free. For mountaineering guides, access includes nearly two- thirds of the upper mountain. Backpacking guides are restricted to trails only (in summer) and are further limited by the frequency of trips and day of the week (as well as the new low elevation commercial free area).

FEASIBILITY – PHYSICAL/OPERATIONAL (15 comments)

FPO1) Comment: The plan should address the operational feasibility of the various alternatives.

FPO1) Response: The overall operational feasibility of the various alternatives was considered and determined to be manageable. Once the final alternative is approved, the operational details will be worked out and implemented in an Operations Plan for each contract. Key operational information has been inserted into the revision of the plan and analysis.

GATEWAY COMMUNITIES (76 comments)

GA1) Comment: A financial impact assessment should be conducted to evaluate impacts to the current concessioner, the local communities and potentially successful bidders.

GA1) Response: While it would be possible to project some impacts to the current concessioner and local communities based on actions identified in the Commercial Services Plan, these projections would necessarily be based on a large number of assumptions, including the likelihood of the current concessioner retaining one of the proposed contracts, the likelihood of other potential concessioners establishing operations in certain local communities and the likelihood of competition affecting pricing, etc. Therefore, the possibility of the analysis identifying actual impacts would be speculative. This could render the analysis either not very useful or invalid. Some additional information has been added to clarify this on page 122 in the Environmental Assessment.

GA2) Comment: The proposed (apparently reduced) limits on guided climbing will have a severe effect on the current concessioner, including precipitating lay-offs and reduced facilities and services.

GA2) Response: Although changes in the plan could affect the economic situation of the current concessioner depending on what portion of the guided climbing they retained, these impacts would be unlikely to have any discernible effect on the local economies of Ashford, Elbe, and Eatonville. At the time of the writing of the Commercial Services Plan/ Environmental Assessment it was unknown whether the current concessioner would have a right of preference for one of the new contracts. A right of preference is determined through the prospectus process. A right of preference allows an incumbent concessioner to meet the terms of a competing offer. As determined in the PriceWaterhouse Coopers financial feasibility analysis, it is likely that guided climbing concessioners would continue to be based out of the west side of the park, employing staff, constructing and using established buildings and offering some operational facilitation of their services, including through local and regional employment.

GROUP SIZE (70 comments)

GS1) Comment: Climbing group sizes should be reduced from the current limit of twelve due to unacceptable resource impacts, safety issues, impact of these groups on independent parties, and difficulty in teaching large parties. Climbing group sizes should be increased from the current limit of twelve.

GS1) Response: Climbing group sizes are regulated by party size limits outlined in the Wilderness Management Plan. A party size of up to twelve is permitted when camping on snow or ice, or when in a designated camp, since there would be negligible resource impacts from camping. Otherwise, the party size limit is five. Guide services can certainly have fewer than twelve persons if they so choose. While altering group sizes was considered in the planning process (especially increasing small climbing group sizes to a party of six), consistency with the existing Wilderness Management Plan limits and goals was determined to be more important.

GS2) Comment: Client to guide ratios for guided climbing and other activities should not be regulated, rather they should be determined by the judgment of the qualified guide.

GS2) Response: Not establishing client to guide ratios was considered but rejected in the development of the alternatives because the park expects a minimum standard that will both allow the guided climb to be led safely and ensure that guided climbers who drop out along the way can continue to be accompanied by guides, thereby both ensuring the safety of the continuing climbers and increasing the summit success ratio for the guide service. The current client to guide ratio, therefore, may have an indirect effect of changing guided climbing group sizes to a mixture of nine clients and three guides (for groups of 12). See modifications to page 106 of the Environmental Assessment (Attachment 1: Errata).

GUIDED ALPINE WILDERNESS ALTERNATIVES (21 comments)

GAW1) Comment: Higher Guide Alpine Wilderness limits would support the ability of commercial services to diversify non-summit mountaineering courses, including in education, training, science, research, photography and the arts.

GAW1) Response: While this is true, the NPS believes that these types of non-summit mountaineering courses may also be more appropriately provided by non-profit organizations. As a result, while alpine training has been indeed made part of the guided climbing selected

alternative, the other aspects of the Guided Alpine Wilderness Alternatives have been dropped from the plan to allow future opportunities for non-profit entities to provide these services.

GAW2) Comment: What criteria will be used to select Guided Alpine Wilderness CUAs? Will concessioners be allowed to bid?

GAW2) Response: As noted above, the alternatives for Guided Alpine Wilderness CUAs have been dropped from the plan and alpine training has been added to the climbing concessioner opportunity. Had these CUAs remained, all qualified businesses, including concessioners, would be allowed to apply for an opportunity unless the park determines that applications from concessioners for an activity are hindering the goal of providing visitors with a choice of service providers. (Concessioners can also apply for other CUA components of the plan.)

GAW3) Comment: Could Mount Rainier become a mountaineering guide training ground based on the limits in the Commercial Services Plan?

GAW3) Response: Because the purpose of the plan is to address access to recreational opportunities at Mount Rainier National Park, the plan does not address opportunities to serve as a training ground for guides. Guides, based on economic necessity and a desire for different opportunities, frequently move among various companies. These incidental opportunities will continue to exist for guides to use the park as a training ground, but using the park as a guide training ground is not an objective of the plan. Even so, the number of guiding opportunities contained in the original and modified preferred alternative exceeds the highest commercially guided climbing levels ever achieved on the mountain and therefore may indirectly provide this opportunity.

GAW4) Comment: The Guided Alpine Wilderness section should be re-done to include other opportunities not associated with summit attempts in addition to schools and training. It should include mountain circumnavigations as well as other potential activities such as climbs of Little Tahoma or St. Andrew's Rock, day climbs in the Tatoosh, or ski and snowboard descents from Muir. There are a variety of alpine activities not associated with climbs that take place or could potentially take place in the park that the Commercial Services Plan should address.

GAW4) Response: The final plan eliminated the Guided Alpine Wilderness alternative and merged some of the activities into the concessions contracts. Several of the activities noted in the comment can be accomplished by the concessioners or through the use of a CUA. Circumnavigations were noted in the draft plan, although consistent high elevation commercially guided circumnavigations will no longer be possible due to the creation of commercial free zones. Climbs in the Tatoosh also would not be permitted due to the new low elevation commercial free zone.

GUIDED CLIMBING ALTERNATIVES (127 comments)

GC1) Comment: There were numerous public comments which suggested variable numbers of concessioners on the same or different routes, including establishing dominant, sub-dominant or north south or east west concessioner relationships. Many of these dealt only with the Muir Route or Muir and Emmons Routes and said nothing about what would be done with other climbing routes. One suggested dividing the year into thirds and allocating unequal access to concessioners of all routes. Some suggested dramatically increasing or not limiting the number of Single Trip Guides.

GC1) Response: While changing the number of concessioners would indeed be a different way of allocating concession use on Mount Rainier, there would be negligible differences in the range of impacts to park resources, other than to the degree of choice (from 2, 3 or more) concessioners

for visitors. As noted in the considered but rejected section (see pages 15- 17 in the Environmental Assessment) and in response to a comment above, alternatives including up to 5 regular concessioners would be possible on the Muir Route, up to 3 concessioners on the Emmons Route and up to 2 concessioners on the Kautz Route, without rotation, given the other objectives in the Commercial Services Plan (including limiting impacts to independent use by not allowing commercial weekend use of other than the Muir Route, ensuring viable business opportunities, etc.). Seasonal use has been allocated for the climbing routes most affected by seasonal conditions (Emmons and Kautz) in the selected alternative.

GC2) Comment: There were numerous comments that suggested increasing or decreasing the maximum potential limits associated with various climbing routes, including returning the Muir Route experience to a one filled with greater wilderness solitude or, conversely, offering it up as a “sacrifice” route by dramatically increasing use and disallowing commercial use of routes other than Muir.

GC2) Response: As presented in the Alternative 1 (No Action) the maximum potential number on the Muir Route would be 8,260 people per summer, given the current concessioner limit of 59 people per night and the 138- day summer season. By the same token, the maximum potential limit for the Emmons Route would be 856 (12 people per night times 2 camps, times 107 (*June 1 to September 15*) days = 2,568 people). The same reasoning on the Kautz Route would yield a maximum of 624 people (12 people per night times 2 camps times 78 (May 15 – August 1) days = 1,872 people). For Other Routes, maximum potential use would be more difficult to calculate, and would depend on the route and the number of days it would typically take to climb times the number of days the route is usually available to climb during its best season. There is little justification for setting the proposed interim use limits in the plan at the maximum potential physical capacity of the route. As has been demonstrated many times in both national parks and other areas, once user limits have been defined at a certain level, it is difficult to reduce those limits, even when adverse impacts are found. Setting interim use limits at a reasonable level, given the projection for continued increases in mountain climbing coupled with ongoing population increases (see financial feasibility analysis), is a better course.

GC3) Comment: Some respondents suggested doing tests or trials to determine the viability of new concessioners or new limits, including phasing in of new limits by dropping the current concessioner’s limits by a certain percentage each year.

GC3) Response: Concessions contracts, by NPS policy, generally have 10 year terms. Contract conditions and franchise fees are based on the activities that will occur during the term of the contract. It would be a substantial burden for a potential concessioner and the NPS to develop business models based on constantly changing potential use limits. Administratively, the NPS prefers to establish the conditions of a contract for the full term during the prospectus process rather than to continually modify the conditions throughout the term. A fixed model also allows concessioners to predict their revenues and expenditures with greater certainty.

GC4) Comment: All first- time climbers should be guided.

GC4) Response: While climbing may have more inherent risks than other park activities, it has rarely been the policy of the NPS to screen visitors before allowing them to participate in activities. Many first time climbers choose to climb with an experienced partner or with a commercial guide and the NPS encourages this practice.

GC5) Comment: The alternatives do not address the seasonality of climbing Mount Rainier. Increase peak season limits (including July and August or June through September or May through October).

GC5) Response: In response to public comments and additional staff analysis, both peak season and overall guided climbing limits have been increased over those shown in the draft plan in the selected alternative. These limits do not, however, reach what would have been the maximum potential limits that could have been achieved under the No Action Alternative (Alternative 1).

GC6) Comment: RMI pioneered commercial climbing on the mountain and is a local treasure with an international reputation. The RMI climb is a unique climbing experience and part of the heritage of the park. The plan should recognize this by allocating the current concessioner an historic percentage of use.

GC6) Response: While it is unclear if the current concessioner will be determined to have a right of preference, contract “A” in the selected alternative has been developed to recognize the approximate use levels of the current concessioner. If it is determined that the current concessioner has a right of preference (a determination that can only be made through the prospectus process), then contract “A” would be the contract to which the right of preference applies.

GC7) Comment: Turn over unused concession spaces to Single Trip Guides or other independent certified guides.

GC7) Response: The Single Trip Guide program has been established, on an experimental basis, to accommodate non- concession certified guides. An allocation of space has been provided for participants in this program. Concessioners book clients both in advance and on fairly short notice. By the time that a concessioner realizes that they are unable to sell a portion of their allocation, the time frame would be too short to process a Single Trip Guide permit and for a Single Trip Guide to plan a trip. Instead those spaces, except for the Muir Snowfield group site, would become available to the public.

GC8) Comment: Combine the proposed services under the various guided climbing, wilderness and alpine wilderness and additional services alternatives in the plan, including adding to the array of concession- offered services or lumping similar services together.

GC8) Response: The Selected Alternative has mixed an array of similar services back into concessioner allocations to minimize the number of permits needed to conduct similar activities and to increase the diversity of year round concessioner services.

GC9) Comment: There are at least three good group campsites on the snow at Camp Muir within walking distance to toilets on the ridge, which would be good for services to use to establish tent camps – Cowlitz Glacier (via the Ice Caves Trail), Nisqually Glacier (9,600 feet), and the “football field” below Ingraham Flats. These campsites would allow guide services to experiment with non- traditional summit climb and training programs (3- 5 day programs).

GC9) Response: While the selected alternative does reincorporate use of the Muir Snowfield and Ingraham Flats for concessioner guided group camping, the revision does not propose adding new camps to replace currently designated camps. Designating new camps is not within the purview of the Commercial Services Plan. Rather, the appropriate vehicle for changing designated camps is the forthcoming Wilderness Management Plan.

GC10) Comment: The four alternatives are not reflective of a reasonable range of alternatives.

GC10) Response: The alternatives are a reasonable range that meet the purpose and need for the plan. They vary from continuing the status quo (No Action) to changing the mix and level of commercial use and the number of service providers for that use at Mount Rainier.

GC11) Comment: The preferred alternative fails to address the current concessioner's status as a preferred bidder and whether that assumption is viable.

GC11) Response: The process of determining a right of preference is accomplished through the prospectus development process rather than through the planning process. Further, a right of preference does not include a right to provide a certain level of service. By regulation, the service provided by an existing concessioner may be expanded or diminished in a new contract without affecting a potential right of preference.

GUIDED CLIMBING REDUCTION (232 comments)

GCR1) Comment: Why don't the limits in the Commercial Services Plan apply to both independent and guided climbers?

GCR1) Response: The Commercial Services Plan was intended to set commercial use limits. Another planning document, such as the Wilderness Management Plan, is the best place to set overall use limits (specifically independent use limits).

GUIDE REDUCTION (336 comments)

GR1) Comment: Setting limits on commercial guiding would affect the access to guided climbs for those who seek it most, the first- time climbers.

GR1) Response: While it is true the limits set in the Commercial Services Plan would over time be met and would then effectively reduce what has been an ever- increasing number of guided climbers on Mount Rainier, those same limits would provide (as they do now) ample opportunities for first- time climbers to choose to go with a guide. The demand for guided climbing, as an activity, has been declining at Mount Rainier and there is currently surplus capacity for a guided experience – a trend that will likely continue through the next several years.

GUIDED WILDERNESS ALTERNATIVES (47 comments)

GW1) Comment: There should be specific actions (alternatives) in the Commercial Services Plan that target guide services and non- profit organizations who cater to youth.

GW1) Response: Non- profit organizations are generally outside of the scope of the plan. The 1998 Concessions Management Improvement Act generally exempted non- profit organizations from the CUA process. The National Park Service is in the process of developing implementing rules for CUAs and the final product will more clearly define the exemption criteria and process.

Programs geared specifically towards youth could be managed by the park's Division of Interpretation, through the proposed Mount Rainier Institute, or through non- profit organizations operating under a special use permit.

GW2) Comment: Single Trip Guides should be included in the commercially guided wilderness CUA proposals.

GW2) Response: Although there is no restriction on an independent guide applying for a Guided Wilderness – Summer or Winter CUA, or for that matter other permits to provide day hiking and

other activities, there is a strong desire by the park to facilitate a longer term relationship with service providers providing Guided Wilderness services. Guided Wilderness services will therefore contain multiple guiding opportunities and may be authorized with a two year permit, thereby giving the park a greater opportunity to monitor these services. This extended contact with the park will not only provide a greater opportunity for feedback to permit holders, but should allow this feedback to improve compliance with park expectations of services to visitors and protection of park resources.

GW3) Comment: Cross- country travel provides an opportunity to teach important backcountry navigation and Leave No Trace techniques and skills. Guided cross- country use should be permitted.

GW3) Response: In the selected alternative, cross- country travel, allowed during the winter on snow, will enable this training opportunity. Cross- country travel in summer was omitted from the selected alternative because it is an activity which, if not managed well, may lead to repeated use of the same areas (causing vegetation damage leading to trail formation - an unacceptable impact in the pristine and primitive zones designated by the General Management Plan).

GW4) Comment: Limit commercially guided groups to less frequently used trails.

GW4) Response: Commercially guided groups are limited to some less frequently used trails and/or time periods. Overnight use in summer is restricted to designated camps on maintained trails. In the selected alternative, the popular Wonderland Trail is closed to overnight commercial use in July and August.

GW5) Comment: How did the park arrive at the day limitations on wilderness trips set forth in the plan?

GW5) Response: Due to the high visitor use in the summer season by independent users in the backcountry campsites, only a very limited amount of commercial use could be permitted. The demand for backcountry campsites exceeds current availability and any commercial use in this activity displaces independents. This resulted in the limitations set forth in the Commercial Services Plan.

GW6) Comment: Respondents suggested alternative variations for modifying commercially guided wilderness use and use limits, including: establishing a flexible number of CUAs that could be changed depending on demand/conditions; allotting 15 percent of total wilderness use to CUA holders; changing the number of CUA holders, number of trips, length of trip or trip routes; eliminating wilderness CUAs; pooling unused limits among CUA holders; and managing the CUA limits by the number of user nights rather than the number of trips.

GW6) Response: Because there is already high visitor use in wilderness by independents in the summer, allotting 15 percent of total wilderness use to CUA holders would displace existing independents in favor of commercial use. Avoiding this impact was a key goal of the Commercial Services Plan (see page 28). In the selected alternative the objective was to allow wilderness guiding as an appropriate, but not necessary activity by allowing limited CUAs with minimal displacement of the already high independent use.

Ideally, establishing flexible numbers of CUAs that change with demand/conditions or increasing the number of CUAs would be possible, but is not a reasonable way to manage CUAs because they would then require a huge administrative commitment, resulting in high costs that would essentially be borne by visitors reserving trips. Because CUAs are managed under an administrative cost recovery strategy, the cost to manage the CUAs would be passed onto the

CUA holder who in turn would pass it on to their clients/visitors. Further, use by independent visitors only begins to be known by the park starting around April 1 of each year – several months after the deadline has passed to apply for CUAs.

In the selected alternative, the number of CUA holders is the same as in both the No Action and the preferred alternative. The number of trips is reduced over no action, while trip lengths are similar. CUA limits are specified both in terms of the number of people and the number of user nights.

GW7) Comment: Commercially guided wilderness use limits in all alternatives are well below what is possible. Guided wilderness users make up less than one percent of availability. The proposals are inconsistent with documented use (noted on pages 47- 48 of the Environmental Assessment).

GW7) Response: Because one goal of the Commercial Services Plan was to hold commercial use at or near existing use levels, rather than allowing it to escalate over time to the maximum potential allowable use, eliminating wilderness CUAs was considered but rejected. Independent demand in summer already exceeds availability for the popular designated camps and sub- alpine areas. Through hikers on the Wonderland Trail often have difficulty securing a campsite. For guided wilderness, park managers have determined that guided services, although appropriate, are not “necessary,” since most people undertake these opportunities without the benefit of a guide. Were an increase in commercial opportunities to be proposed, it would take spaces away from the independent public, violating another goal of the plan (see page 28 of the Environmental Assessment).

GW8) Comment: Companies will have trouble meeting their operating costs with the limits described for commercially guided wilderness alternatives (one trip each in summer and winter). Because it is difficult to know what the public will want, being able to offer multiple departures significantly increases the likelihood of actually running programs.

GW8) Response: The CUA process allows businesses an opportunity to provide a service. A trip into the park is viewed as an incidental part of a company’s operation. During the moratorium, the park has found that there is a high demand from commercial service providers for limited access to the park for overnight trips. The selected alternative meets one goal of the plan by allowing visitors a choice of service providers to evaluate, albeit not trip dates (which would be distributed among service providers – one each). Different companies operate under different business models. The incidental CUA opportunity offered in the plan may fit the business model of one company while conflicting with the business model of another company.

GW9) Comment: Commercially guided wilderness use should be a concession.

GW9) Response: Commercially guided wilderness trips are viewed as an incidental opportunity for which there appears to be a high demand among potential guide services. Commercially guided wilderness trips, given the extremely limited opportunity, are also unlikely to be profitable as a stand- alone business. Consideration was given to merging this opportunity into the guided mountaineering concessions; however, the activity was determined to be different enough from mountaineering to warrant exclusion from the guided climbing concession contracts.

INDEPENDENT vs. GUIDED (467 comments)

IG1) Comment: What do NPS data show about how many independent users have been denied a route to climb or a wilderness zone due to guided climbers?

IG1) Response: The park does not currently track this information; however, it is likely that climbers will seek an alternative route if their first choice route is not available (this is supported by anecdotal evidence regarding the wilderness permit system).

IG2) Comment: It is arguable that because of the moratorium on guided climbing that it has decreased in relationship to independent climbing. As a result, the analysis of the no action alternative may be incorrect.

IG2) Response: Both Mount Rainier National Park statistics (see Table 8 on page 44 and Figure 2 on page 48 of the Environmental Assessment), and national trends (see PriceWaterhouse Coopers financial analysis) show a steady increase in guided climbing and most other recreational use over time. Any effect of the moratorium would be temporary and not likely to persist when the moratorium is lifted. As a result, the analysis in the Environmental Assessment regarding the No Action Alternative identifies impacts that would occur, over time, in the absence of limits imposed by the Commercial Services Plan or moratorium. The second portion of Table 8 (on page 45 of the Environmental Assessment) shows the increasing percentage, over time, of independent vs. concession climbing.

LIMITS GUIDED CLIMBING (574 comments)

LG1) Comment: Respondents identified a wide range of adverse and beneficial effects of establishing limits for commercially guided climbing activities, including a decrease in the opportunity for a guided climbing experience; changes in guiding standards, available guide services, or the supply of guided climbs; increases in legal vulnerability, illegal guiding, and the cost of guided climbing; as well as a way to balance commercial use and preservation thereby preventing overuse and overcrowding.

LG1) Response: Contrary to many public comments on the Commercial Services Plan, guided climbing opportunities actually would undergo a minor to moderate increase in the selected alternative. As guided climbing increases to meet the limits in the Commercial Services Plan it is unlikely to produce the noted adverse effects of a decrease. In fact, the increased number of commercial services providers in the plan (as noted in the analysis) combined with specifically designed mitigation measures is likely to produce beneficial effects on guiding standards, the cost of guided climbs, and the conformance of guide services to resource protection measures, as well as to the provision of a quality visitor experience.

LG2) Comment: Respondents noted that the proposed limits overall or for specific routes such as the Muir Route were both too low (due to high demand) and too high (due to current dangerous, overcrowded and generally less enjoyable conditions) or that there should be no limits. Many respondents felt that the alternatives did not provide an adequate range regarding the establishment of limits for commercially guided climbing on the Muir Route and that these limits were unnecessarily constrained by the goal of keeping use at or near current levels.

LG2) Response: The range of alternatives in the plan for the Muir Route includes no limits (Alternative 1), slightly increasing guided climbing (Alternatives 2 and 3) or slightly decreasing guided climbing (Alternative 4). All of the action alternatives keep guided climbing near the existing level. The overnight limit for guided parties was decreased from a potential of 59 to 48 guides and clients. According to park data, the average number of guides and clients camping on the route is currently less than 30 per night in July and August, although this number is higher on weekends. The Commercial Services Plan will require and encourage a more even distribution of commercial use during the week, and before and after July and August.

LG3) Comment: Commercial use limits should be more flexible to release unused slots and to reflect changes in demand as well as future changes to the Wilderness Management Plan.

LG3) Response: As noted on page 56 of the Environmental Assessment, these use limits may be modified “upon a finding that previously unidentified or unacceptable adverse resource impacts” are occurring. The use limits are also considered interim (as noted in the plan and Environmental Assessment) pending an update to the Wilderness Management Plan and/or development of carrying capacity analyses.

LG4) Comment: There should be equal commercial and independent limits.

LG4) Response: Because park visitors are of varying economic means and abilities, the establishment of equal commercial and independent limits is not the most effective means of providing services to all visitors. Commercial use is allowed in a national park only as necessary and/or appropriate to provide visitor services. The park has long sought to find a method to determine the appropriate amount of commercial use in the park and, as noted on page 17 of the Environmental Assessment, has considered but rejected various means of establishing a percentage or ratio of commercial to non-commercial use. Rather, the park has continued to rely on its historic practice for limiting commercial climbing (an activity determined necessary) to approximately one third of allowable use (see revision to page 56 of the Environmental Assessment) and allocating commercial use in other appropriate areas (those determined appropriate but not “necessary”) to a portion of total use that minimizes effects on independent park visitors.

LG5) Comment: The designation of limits for commercial uses in the plan is arbitrary and should be justified. Carrying capacity, resource management and visitor experience studies have either been ignored or inadequately considered. What indicators and standards were used to set these limits?

LG5) Response: As noted on page 56 of the Environmental Assessment, the analysis is “based on the assumption that revisions to the Wilderness Management Plan would be made. . . or that a Carrying Capacity Plan would be written. . . and that these plans would likely reduce the effective carrying capacity of park wilderness management areas.”

The limits were developed from allocating a portion of the existing physical Wilderness Management Plan limits and existing actual visitor use in a way that would work logically with seasonal conditions on the route or area and with the expected number of concessioners and then modifying those limits, by either changing numbers or route restrictions and adding mitigation conditions, to ensure that the number of commercial visitors would not adversely affect the quality of the independent experience on the route (a key goal of allowing commercial services).

LG6) Comment: Commercial use limits identified in the Commercial Services Plan will result in inexperienced climbers who could not go on a guided climb attempting to climb without one.

LG6) Response: Regardless of the opportunity available, some inexperienced climbers will likely continue to climb without guides or experienced partners. It is also possible, however, that the greatest deterrent to a guided climb is the cost charged by commercial service providers rather than other factors.

LG7) Comment: The Commercial Services Plan did not consider the demand for climbing during the peak season (variously summer – June, July and August; July and August; May or June to September; etc.) in its proposed commercial use limits. Many respondents suggested increasing limits to respond to the bell curve of climbing during the peak season. Others suggested that it

would be difficult for a business to add capacity for this short duration peak season of (variably) 2- 6 weeks depending on weather- influenced route conditions.

LG7) Response: In the selected alternative, in response to public comments and additional staff analysis, both peak season and overall guided climbing limits have been increased slightly on the Muir Route over those shown in the draft plan.

LG8) Comment: Commercial use limits identified in the proposed alternatives do not correspond with the limits in the Wilderness Management Plan. The Wilderness Management Plan limits should be updated prior to modifying the commercial use limits. Changing the limits at this time is not warranted.

LG8) Response: The commercial use limits identified in the proposed alternatives do correspond with the limits in the Wilderness Management Plan. The Wilderness Management Plan is a living document. Annual adjustments have been made to use limits since the 1992 printing of the most recent version of the Wilderness Management Plan. The Wilderness Management Plan is scheduled to be updated in the near future to incorporate changes dictated by the General Management Plan and to summarize the annual changes made since 1992.

LG9) Comment: The Commercial Services Plan should establish an interim use limit for commercial operations until the Wilderness Management Plan update is completed.

LG9) Response: The limits defined in the Commercial Services Plan/Environmental Assessment are interim use limits and allow more use than is currently occurring. Language on page 88 of the Environmental Assessment, for example, specifically states this intent: “Define an interim maximum allowable use for commercial services in Mount Rainier National Park that will be in effect until revisions to this plan, the Wilderness Management Plan or until carrying capacity studies have been completed.”

LG10) Comment: Increase or don’t allocate limits for winter commercial use.

LG10) Response: Winter use limits were established because of the lack of winter staff to monitor an unlimited number of CUAs or to conduct search and rescue operations. While fewer climbers may actually take advantage of winter opportunities to climb, the limits are appropriate given reduced park staffing in winter and the effects of winter weather and route conditions.

LG11) Comment: Impose limits only if there is carrying capacity resource data to support them.

LG11) Response: Unfortunately, under new regulations, without identified limits, CUAs would be issued to all applicants, regardless of the potential for impacts. The new concessioner climbing contract would continue to allow a rise toward the maximum potential physical carrying capacity levels identified by the Wilderness Management Plan. Without additional mitigating measures included in the selected alternative in the Commercial Services Plan, existing impacts to park resources would continue and there would be little ability to control the numbers of commercial visitors or their impacts. As a result, the integrity of park resources could be affected while carrying capacity studies are carried out. Because carrying capacity data are difficult to obtain and are not currently available, the park has elected to set limits in the absence of carrying capacity data to prevent ongoing and potential future unacceptable impacts from affecting the integrity of park resources. (See also Carrying Capacity section above.)

LG12) Comment: Establish commercial and independent use limits based on a ratio rather than a numeral.

LG12) Response: Refer to the Alternatives Considered But Rejected (page 17 in the Environmental Assessment) for rationale for not establishing commercial and independent limits as a ratio.

LG13) Comment: Establish use limits based only on user days/nights.

LG13) Response: Wilderness Management Plan overnight use limits were originally based on how many people could reasonably camp in an area without causing unacceptable resource and social impacts. As noted above, these limits have been modified over time to account for evidence of resource damage and overcrowding. The number of permits is limited for designated camps, cross-country zones, and most alpine zones, although some alpine zones and camps are limited by user nights only. Total use for the park's wilderness is tracked by user nights (this includes both the number of people in the party and how many nights they spend in wilderness). See *Alternatives Considered But Rejected* (page 17) for why this strategy was not used in the plan.

LG14) Comment: Any further increase in guided climbers on the Muir Route will adversely affect independent climbers in the Muir corridor.

LG14) Response: The mitigation measures in the selected alternative have been designed to minimize the effects of guided climbers on independent climbers. Group size and overall limits on the number of guided climbers as well as Friday/Saturday night restrictions on some routes, commercial free areas on other routes and spacing between groups (staggering) have been included. Potential commercial overnight use has been reduced from 59 clients and guides per night to 48 clients and guides on the Muir Route.

LG15) Comment: The dramatic increase in commercial use of the Emmons (two and half times 2001 commercial) and Kautz (six times 2001 commercial), and Other (two times 2001 commercial) routes is unwarranted, especially if independent use stays at the same levels (*Note: Increases in parentheses are those from the new selected alternative, which vary from those in the previous suite of alternatives cited by the commenter*). The Friday/Saturday night restrictions and commercial free area are the minimum necessary mitigation to ensure that these routes can continue to be more focused toward wilderness solitude and do not become like the recreational experience of the Muir Route.

LG15) Response: Commercial free areas and Friday/Saturday night restrictions have been maintained in the selected alternative to reduce the effects of commercially guided climbers on independent climbers. The General Management Plan called for high and moderate use climbing zones, which have been adhered to in the Commercial Services Plan.

LG16) Comment: Many visitors dislike or are unsuited for the current model of climbing the Muir Route (2- day) and would benefit from an opportunity to do 3 or even 4 day climbs on route. The plan should encourage multi- night stays because of the benefit of further developing climber and environmental education and because of the benefits from not repeatedly making camps. It should allow for trips up from 6- 8 days long, with multiple nights in the Muir Corridor.

LG16) Response: The plan both supports and adds to the two day summit model in the Muir Corridor. By shifting some actions within the proposed alternatives to concessioners and by increasing the number of available user nights, the selected alternative also supports seminar/expedition experiences. While overnight use is limited to certain locations along the route, concessioners may choose to use their allotments in the Muir Corridor in any manner consistent with the Commercial Services Plan goals and mitigation strategies, including for multi-night seminars.

LG17) Comment: Although the plan states that it is keeping limits at or near current levels, in fact, all alternatives increase overall guided climbing on the mountain as well as climbing on the Emmons, Kautz and Other Routes. Only the Muir Route is maintained slightly above its current level.

LG17) Response: As noted in the plan, while guided climbing levels were modified to correspond to their General Management Plan designations, other commercially guided activities have been maintained near the same level as previously allowed.

MONITORING (16 comments)

M1) Comment: The Commercial Services Plan targets the upper mountain more than the lower. Protect the lower mountain by increasing mountain patrols on the lower portion as well. The greatest damage is done by those without supervision in the heavily used subalpine areas.

M1) Response: Potentially increased franchise fees and CUA cost- recovery fees will likely allow some additional monitoring of areas used by commercially guided groups. The park also continues to seek funding sources to increase the presence of park staff in the heavily used subalpine meadows, particularly on the Muir Route.

MUIR ROUTE MAINTENANCE (61 comments)

MR1) Comment: A single concessioner in the Muir corridor would avoid accountability and coordination issues regarding Muir Route maintenance. Multiple guide services could result in differences of opinion about how the route should go. A single concessioner would also be able to make a significant contribution to the employee hours, wands, ladders and rescue equipment needed to maintain the route.

MR1) Response: A key component of the prospectus process will be a determination of how multiple guide services plan to cooperate to maintain this route.

MR2) Comment: Multiple guide services would be capable of sharing the responsibilities of Muir Route maintenance. Standards for route maintenance should remain at high levels.

MR2) Response: The operational details of ensuring route maintenance among several guide services have yet to be determined. This issue, however, is not expected to be insurmountable and some standard will be in place on the Muir Route, as well as on other routes. Some route maintenance is consistent with the high use designation. The presence of some persistent route aids on the Muir Route could potentially be grandfathered in.

MR3) Comment: The maintenance of the Muir Route contributes to the additional popularity of that route with independent climbers. Independent climbers count on the current concessioner's wands, ladders, troughs and daily presence. These artifacts contribute to an easier and safer experience for beginning climbers.

MR3) Response: As noted in the revised plan, which recognizes this issue, some maintenance of the Muir Route will continue under the selected alternative. The degree of this maintenance and the consequent operational details will be determined by the park. The ability of the concessioners to carry out the park's vision for managing the routes will be evaluated through the prospectus process. Wands and portable ladders, of course, will continue to be allowed, used consistently with the Wilderness Management Plan (placed enroute, removed enroute).

MR4) Comment: The National Park Service should supervise and implement Muir Route maintenance.

MR4) Response: While there are some questions about the degree of route maintenance that should occur, the NPS recognizes that some degree of Muir Route maintenance should continue, however the Emmons and Kautz Routes will remain unimproved. Just as some wilderness trails have constructed trail bridges and other features that minimize the adverse consequences of trail use, in the same way high use climbing routes may need some degree of route maintenance to sustain that use. How that maintenance will be provided is one of the cooperative management issues needing resolution prior to and during implementation of the Commercial Services Plan. The ability of concessioners to carry out the park's vision for managing the routes will be evaluated through the prospectus process.

MUIR SNOWFIELD (5 comments)

MS1) Comment: Commercial camping on the Muir Snowfield should not be eliminated. Not all commercial users should be expected to climb to Camp Muir in a day.

MS1) Response: While the preferred alternative originally called for eliminating commercial use of the Muir Snowfield, the selected alternative reincorporates use of the Muir Snowfield for commercial use with some modifications, including the designation of a commercial group campsite on the Snowfield that would not be available to independent climbers. Both actions meet the goal from page 30 of the draft Commercial Services Plan: "Overnight commercial use of sensitive areas should be limited or prohibited."

MS2) Comment: Commercial camping on the Muir Snowfield should be eliminated on Friday and Saturday nights in summer or altogether. The Paradise/Cowlitz alternative with camps at Paradise Glacier and Ingraham Flats could replace the camping on the Snowfield and achieve the NPS goal of avoiding camping near the sensitive fell- field areas.

MS2) Response: As noted in other responses above, other variations of modifying commercial use were considered and rejected for various areas affected by the Commercial Services Plan. To stay within the bounds of currently designated (through the Wilderness Management Plan) camps, the NPS has avoided the inappropriate additional designation of new alpine camps via the Commercial Services Plan.

MS3) Comment: Elimination of the concession presence on the Muir Snowfield removes the most responsible group from the area. They are Leave No Trace certified. The presence of guides often brings out advice upon resource impact situations and helps to protect the mountain. Commercial guides also assist in enforcing NPS policies.

MS3) Response: As noted above, commercial use of the Muir Snowfield has been reincorporated into the selected alternative. Although there is some disagreement over whether commercial use assists or detracts from resource protection in this area (see page 89 of the Environmental Assessment), designating a commercial use campsite will ensure that commercial impacts can be adequately tracked over time. Ideally, future use of cost recovery and franchise fees may increase monitoring of the sensitive fellfields traversed by the Muir Snowfield and will serve to limit both commercial and independent impacts in this long- studied, sensitive area.

PERMIT ALLOCATION (52 comments)

PA1) Comment: All guides operating on Mount Rainier should have professional credentials. These could be phased in over time. At a minimum guides should have Leave No Trace certification, Wilderness First Responder medical training and Level 1 avalanche certification.

PA1) Response: Guide training and certification levels are a key part of a safe operation. As noted in the plan, guides on Mount Rainier are expected to be trained and have at a minimum, Wilderness First Responder, Leave No Trace and avalanche training.

PA2) Comment: Consider a lottery for concessioners during the first year of the Commercial Services Plan, and then monitor how these services are able to reach set goals. If service is unable to fulfill a large portion of their allotted permits, re-allocate them to guide service who could fill them. On the other hand, each concessioner could start with a fixed number of reserved slots, but there would be a number of "communal slots that any of the concessioners could reserve on a "first come first serve" basis. If a certain percentage of these slots were reserved but not used by a concessioner over a specified period of time, the fixed reserved slots for that concessioner would be reduced by a specified amount. Over time, there could also be an adjustment of the fixed reserved slots based on the number of communal slots used. This plan would be best implemented as a modification of the preferred plan.

PA2) Response: For a bidder to prepare and present a credible business plan, they have to know what their allocation will be over the term of the contract. Businesses are unable to project revenues, amortize expenses and propose a realistic franchise fee in a climate where their allocation is modified annually.

PA3) Comment: Within the current system of wilderness campsite reservations, determine what are the most popular climbing routes and during what times. It would be helpful to know how many people are being turned away on a given day. Use this information to determine the appropriate number of permits and independent climbers.

PA3) Response: The number of visitors who are unable to obtain reservations is not tracked by the park. Many of those who are not able to obtain reservations for their first choice are able to obtain reservations for a second or third choice.

PA4) Comment: Climbing permits to individuals should be awarded through an open lottery system to a randomized selection of applicants so that the playing field is level for any individual, group or commercial guide service to acquire permits. The whole process should be monitored for collusion amongst individuals or companies.

PA4) Response: Thus far, there has not been a need to change the way individual climbing permits are issued. If commercial activity is suspected in individual permit issuance, an investigation ensues. While past practice has been to allow concessioners to reserve spaces through the public reservation system for areas other than the Muir Route (where permit holders have traditionally reserved space in advance of the public), with the implementation of the Commercial Services Plan, this will cease and concessioners and other permit holders will be able to reserve spaces in advance of the public, but only to the degree allowed by their contract or permit. Commercial service providers are being allowed the opportunity to reserve their allotment in advance to allow for advertising. Allowing parties, other than the concessioner or permit holder, to use a concessioner or CUA authorization is a prohibited practice that is monitored by the park.

PLAN/PLANNING PROCESS (96 comments)

PPP1) Comment: The Commercial Services Plan is not a well- formulated, multi- disciplinary work of sound analysis because it is missing critical information to support the decrease in the number of guided climbers and a cost- benefit analysis that demonstrates the effects on the current concessioner. The Environmental Assessment does not provide enough analysis of environmental impacts, visitor use patterns or economic feasibility of the alternatives.

PPP1) Response: As noted above in responses to other questions about the designation of commercial use limits the rationale for these limits is found in the *Purpose and Need* section of the Environmental Assessment. While a widely misconstrued perception of the Commercial Services Plan was that it reduced numbers of guided climbers and guides, guided climbing has actually increased, both under the original plan and the revised selected alternative. Economic effects on the current concessioner, except as may pertain to broader economic analysis, are not part of an environmental assessment (see clarification of this on pages 122- 123). Economic feasibility of the potential concession contracts was analyzed and presented in the Environmental Assessment and has been conducted for the revised selected alternative. Financial feasibility analyses were conducted using information about the current concessioner’s operation as well as typical information from companies providing similar services. Visitor use information and patterns are detailed on pages 41- 52 of the Environmental Assessment. A diligent process was followed that included public scoping, an ample public comment process that continued for 90 days, four public meetings and a large public response from local, regional, national and international interests. The selected alternative is composed of elements of the four, originally proposed alternatives.

PPP2) Comment: Why were studies not conducted on the amount of impacts by organized groups?

PPP2) Response: While the park has some of its best visitor use impacts information on the effects to vegetation and soils, specific analysis of whether those impacts were created by independent or guided visitors is not available. What is known, however, is the size of the impacts for illegal camping (one of the most damaging activities) in subalpine and alpine areas. These camps are often too small and spaced out to be wholly attributed to the typical guided groups. Therefore it is likely that many were created by independent groups. Only a study specifically designed to sort out the impacts of independent vs. guided groups would be able to say, with any certainty, if this is in fact true. Inadequate funding and staff time devoted to other high priority actions have contributed to the inability of the park to pursue such a study.

PPP3) Comment: The Environmental Assessment has failed to adequately assess the potential for increasing the total number of guides and guided climbers that would be able to participate in commercial activities within the context of a) existing concession authorizations and b) Wilderness Management Plan overnight use limits.

PPP3) Response: The analysis for the existing concession authorizations is the analysis presented in the No Action alternative (Alternative 1). Because the Wilderness Management Plan does not designate the amount of commercial vs. independent use, the potential commercial use would be the maximum allotted by the concessioner contract (as is also shown in Alternative 1).

PPP4) Comment: The preliminary determination to decrease guided climbing opportunities does not appear to be supported by accurate analysis of whether guided climbing impacts, specifically carrying capacity for guided climbing opportunities, supports this goal. Adoption of such a goal is arbitrary and unsupported.

PPP4) Response: The level of commercial guided climbing allowed in the original preferred alternative exceeded the average annual use of the past several years. The selected alternative

further increases the potential annual level of use. The selected alternative also allows for a level of daily use that exceeds the current average daily level of use. The proposed daily level of use is 48 clients and guides per day which exceeds the highest average daily level of use experienced in the highest demand months (July and August).

PPP5) Comment: The plan/planning process is flawed by faulty data, such as the misleading use of the term monopoly and missing steps that should have led up to determining the limits in the Commercial Services Plan.

PPP5) Response: The use of the term “monopoly” had no influence on the planning process. Actually, the National Park Service has traditionally preferred monopoly operators for concessions services. Regardless, the term did, however, figure prominently in public comments on the plan, particularly those in favor of multiple guide services for guided climbing. As noted in the Assumptions section of the Environmental Assessment (page 56- 57), the lack of an updated Wilderness Management Plan and lack of carrying capacity studies led to the need for the stated assumptions. In addition, the NPS recognizes that these plans will likely influence the interim limits proposed in the Commercial Services Plan. All available data were used in the process of developing and modifying the Commercial Services Plan.

PPP6) Comment: Where the Environmental Assessment uses strong research material, it is excellent. When the plan makes assumptions based on usage models and theoretical inferences, it (like the Environmental Assessment at points) is inaccurate – at times far off the mark. Assumptions in the Environmental Assessment about alpine impacts that are unproven are off the mark. The plan has manipulated some of these assumptions to fit the National Park Service’s hoped for proposal. The Environmental Assessment provides insights on visitor behavior and mountain ecology, however conclusions based on research construed to promote negative changes are flawed and faulty.

PPP6) Response: While there are indeed information needs for additional research to separate the impacts of guided vs. independent visitors on park resources, it is also true that some of the best research that has been conducted in the park regarding visitor use impacts has been that conducted in the very areas affected by climbers (subalpine and alpine parklands). The Assumptions and Environmental Consequences sections in the Environmental Assessment give the benefit of doubt to guided park visitors because of the standards of conduct that park businesses must adhere to, to retain their ability to operate in the park. Ultimately, however, the plan ends the ability of businesses to build upon the ever increasing demand for guided climbing by an ever increasing population to the potential detriment of park resources (including visitor experience) until future studies (such as carrying capacity analyses) confirm or deny the adverse and potentially irretrievable impacts to sensitive resources and/or the quality and diversity of the visitor experience.

PPP7) Comment: The recently completed General Management Plan outlines the management direction of the park for the next two decades. The General Management Plan defined the required steps for meeting management goals, however the first management decision following the General Management Plan was to focus on the complex Commercial Services Plan, a plan that should require the completion of many smaller steps before any final draft could be released. Since these studies have not been completed, the proposed Commercial Services Plan is missing fundamental information. Planning decisions made before these studies are completed are premature and negligent.

PPP7) Response: As noted in the above response, the Commercial Services Plan and Environmental Assessment were developed with the best available information. While it is true that additional studies could assist the decision- making process, it is unlikely that such studies

would be conclusive, without years of research. Therefore agencies must move ahead to make decisions with the best information at hand, while continuing to strive for the ultimate answers. The Environmental Assessment has disclosed the fact the missing information on pages 56- 57 as well as the fact that future studies may alter the selected alternative. See also the box entitled “A Dynamic Plan” in the Draft Commercial Services Plan.

PPP8) Comment: The plan should contain an explanation for why client numbers for 2001 were used, rather than an average. Does 2001 represent a year of high use, low use or an average over a longer period?

PPP8) Response: The 2001 Wilderness use statistics were utilized throughout the Commercial Services Plan because they were the most current available data at the start of this planning process, and also the highest overall use. It was felt that a baseline comparison of use would help readers understand the proposed alternatives. A long term average of use would have been lower. The use of the 2001 data is noted on page 5 of the Environmental Assessment. At the time the plan was developed, 2001 data were the most recent available. Since that time, it has become clear that 2001 use was slightly above normal.

PPP9) Comment: The Environmental Assessment should have addressed a more comprehensive No Action Alternative, employing national non- guided and guided statistics and trends at other National Parks to project an expansion of opportunities.

PPP9) Response: Data on current trends in recreational use were provided by the PriceWaterhouse Coopers study and did not vary from the information noted in the plan and Environmental Assessment. This trend information is represented by park visitor use statistics, both in guided climbing and wilderness use (see Table 8 and Figure 2 in the Environmental Assessment). Both show increasing demand for these activities over time.

PURPOSE AND NEED (77 comments)

PN1) Comment: Changes in the guided climbing concession are not warranted. A rationale for these changes should be provided.

PN1) Response: The rationale for the changes was provided in the Environmental Assessment on pages 6- 7 (*Purpose and Need*).

PN2) Comment: The implementing regulations for PL- 105- 391, one driver of the Commercial Services Plan have yet to be approved. Without these regulations, the plan is ripe for legal challenge because it may conflict with these once approved.

PN2) Response: The planning team has done its best to follow the rulemaking process to ensure that the Commercial Services Plan does not conflict with the portion of implementing regulations that have not been finalized. The rules for managing concessions were completed and approved on April 17, 2000. The rules for implementing CUAs are still pending. Regardless, however, it is stated in the Commercial Services Plan that the plan is dynamic and that various proposed limits may be revised in response to new information.

PN3) Comment: What is the rationale for increasing the number of concessioners?

PN3) Response: The primary motivation for the increase in the number of concessioners is to offer park visitors a choice in both the service provider and the services they offer. The expected resultant increase in the array of services, the style of that programming and different methods for

managing client services may also result in the ability to meet a wider range of visitor expectations.

PN4) Comment: Many respondents wondered why the alternatives did not really provide each guide service with separate routes to avoid the perceived issues associated with accountability and safety in adding multiple guide services.

PN4) Response: While this alternative is feasible, it did not meet the purpose and need for the plan, namely the issue of offering the public a choice of operators and experiences, a key goal of the Commercial Services Plan. Even so, the No Action Alternative, as well as Alternatives 2 and 4, would maintain the current situation of one guide service on the Muir Route, while Alternative 4 would have also had a single concessioner on the Emmons and Kautz Routes. Experience managing multiple guide services on the Emmons Route and in other parks does not indicate that there will be any additional safety issues simply as a result of the presence of multiple guide services.

RESOURCE – GENERAL CULTURAL (6 comments)

RC1) Comment: How did the park conclude that potential impacts to archeological resources are negligible when such a small portion of the park has been surveyed?

RC1) Response: The only proposals that would potentially impact archeological resources are the proposed designated trail extensions (to mitigate subalpine and alpine vegetation impacts) where excessive social trailing has already resulted in erosion. These highly disturbed areas would have designated trails located within the disturbed areas and, according to the park archeologist, have a low potential (based on location and previous site disturbance) for archeological resources.

RC2) Comment: The climbing shack used by the current concessioner at Camp Muir is a blemish on such a pristine mountain. Whatever plan is accepted, the exterior should be upgraded to bring it within basic guidelines for all other park buildings.

RC2) Response: The current concessioner's client shelter (Gombu), which cannot be rehabilitated to meet current standards or guidelines regarding historic structures in the Camp Muir Historic District, was proposed for removal under all action alternatives in the Commercial Services Plan. If, through the Camp Muir Development Concept Plan planning process, the decision is made to construct a new structure at Camp Muir, it will be designed to be compatible with the historic district in size, form, materials and location.

RESOURCE – GENERAL NATURAL (108 comments)

RN1) Comment: With many past problems now managed effectively in the Muir Corridor, including garbage and human waste removal, the capacity of this route has increased and cannot be considered fragile. Snow, rock and sand can handle more use. Climbing is by nature an extremely low impact sport. As long as camping/climbing occur on snow, there is virtually no impact.

RN1) Response: While the NPS generally concurs with the above statement, it is also true that climbers on the Muir Route must pass through the very sensitive fellfields in the Muir Corridor and that the sense of crowding (one component of carrying capacity) has increased over time. Without commercial and independent climber and day use visitor education and training, other physical, inadvertent impacts to these areas have occurred, despite numerous management changes to reduce these over time. Future carrying capacity analysis, combined with additional

mitigation measures, including perhaps trail, resting area, and campsite designation may be necessary to protect the sensitive resources enroute to the high camps.

RN2) Comment: The degree of impacts to climbing routes is exaggerated. Above Camp Muir in October, once most climbers have come and gone, and snow has not yet come, there is very little evidence that people have been there at all. Once the trail scars at Cathedral Gap have been wiped out by an avalanche or wind, beyond a little garbage above the Disappointment Cleaver, the path used regularly for almost five months is almost impossible to find.

RN2) Response: While it is true that areas on permanent snow or ice may not reveal impacts to park resources – areas below these that must also be traversed have revealed numerous and increasing impacts over time. See the data and discussion on pages 29- 31 of the Environmental Assessment. The carrying capacity of the resource, however, is comprised of three parts – the physical carrying capacity (for instance how many people or cars or tents can actually fit), the social carrying capacity (how many people can be accommodated before the experience of most visitors is diminished), and the resource capacity (how many people can be accommodated before they cause inadvertent temporary or permanent damage to buildings, vegetation, etc.). Have the wands, blue bags and other route aids, as well as the rock displacement indeed disappeared, or are they buried by snow or in crevasses, only to be revealed as impacts or to cause confusion later?

RN3) Comment: To validate the approach in the Commercial Services Plan of identifying limits, the public should have access to all of the studies you have made, including the metrics used.

RN3) Response: The administrative record for the plan/EA will be available for review once the planning process is complete. The Environmental Assessment contains a reference section and information cited throughout the plan is noted within.

RN4) Comment: The Commercial Services Plan should include mitigation to avoid or restrict access to and through areas used by the Rainier Elk Herd within or adjacent to the park at sensitive times of year, which could distress animals.

RN4) Response: Travel at the lower elevations of the park will continue to occur on currently existing trails. Cross- country travel will continue to occur for parties accessing climbing routes. Use of previously undisturbed routes or trails or major increases in use of current routes is not part of the plan.

RESOURCE – WILDERNESS (34 comments)

RW1) Comment: Some climbing routes such as the Muir Route should be managed for recreation and others should be managed for solitude according to the Wilderness Act mandate to provide opportunities for solitude or primitive, unconfined recreation. More remote, less- traveled routes such as the Kautz and Emmons should be managed to ensure greater solitude focused recreational experiences by not expanding or shifting use levels from those that are already heavily used.

RW1) Response: The General Management Plan identified the Muir Corridor as a high use climbing zone and the Kautz, Fuhrer's Finger and Emmons routes as moderate use climbing zones. All other routes fall within the pristine and primitive Wilderness zones. These designations reflect current proportional amounts of use. These zones allow for varying degrees of wilderness experiences. The Commercial Services Plan merely implements these zone designations.

SHUTTLES (33 comments)

S1) Comment: The requirement for all commercially guided climbers to be shuttled forces guides to a higher standard and penalizes guided climbers, since most independent climbers and all multi- day backpackers use private vehicles.

S1) Response: Operating requirements, such as the requirement for all commercially guided clients to be shuttled, result in enhanced resource protection in exchange for the privilege to operate in a national park. Repeated use of an area, such as that employed by most commercial guiding, has a high potential to result in harm to park resources if conducted without restrictions. Requiring shuttles for all commercially guided clients is the necessary first step in reducing vehicle congestion and parking problems in the park, as called for by the park General Management Plan.

S2) Comment: Consider making shuttles a concession, not a CUA. The capital and time required to operate this activity far exceeds that normally associated with CUA revenues and timeframes. To gain full commitment from its partners, the park should make a commensurate commitment to the objectives of shuttles in the park and to operators willing to engage in these enterprises. A meaningful window of opportunity (greater than two years) is required to merit the investment.

S2) Response: To be viable as a stand- alone concession opportunity, there must be a reasonable assurance for a concessioner to make a profit from the operation. Because transportation studies conducted in the park, during the General Management Plan process, identified the need for subsidizing shuttle operations, they are not yet considered a viable concessioner opportunity. See the summary of the visitor transportation study on page 45 of the Environmental Assessment.

S3) Comment: Shuttle operators should be limited to enhance the economic viability of these operations and to ensure an acceptable level of quality, as well as to limit the potential for adverse impacts from shuttles continually operating under capacity.

S3) Response: The number of CUAs authorized for this activity is admittedly high and reflects the park's desire to provide a reasonable opportunity for a CUA holder to obtain successive permits to operate in the park (since CUAs can be issued for a maximum of two years and there is no preferential right of renewal) and to provide potential operators in gateway communities surrounding the park with an opportunity to experiment with this service.

S4) Comment: Increase the length of the shuttle CUA opportunity.

S4) Response: The maximum length of the CUA opportunities is set by law in the 1998 Concessions Management Improvement Act. The maximum term is two years for a CUA.

S5) Comment: The proposed approach to shuttle services in the Commercial Services Plan is premature and infeasible. Until the Transportation Plan is completed, there is no benefit to including the service in the Commercial Services Plan due to its poor economic viability and the fact that there are few companies even remotely interested in offering public shuttle transportation within the park.

S5)) Response: The Commercial Services Plan merely provides an opportunity for shuttles to operate in the park until a more comprehensive transportation plan is completed. Already several companies have expressed interest in park shuttles.

SINGLE TRIP GUIDES (295 comments)

STG1) Comment: Single Trip Guides should have access to most of the mountain. The park already has quotas to limit use and there should be no additional restrictions.

STG1) Response: Single Trip Guides, like other commercial operators are limited by the designation of Commercial Free Areas. To allow commercial use in a park, it must be specifically decided. Commercial use of a national park is a privilege.

STG2) Comment: The current restrictions on where Single Trip Guides can go drastically limit options and force these guides onto more obscure routes.

STG2) Response: Single Trip Guides, like other commercial operators are limited by the designation of Commercial Free Areas. To allow commercial use in a park, it must be specifically authorized and determined to be necessary and appropriate. Commercial use in a national park is a privilege rather than a right.

STG3) Comment: What is the rationale for the number of Single Trip Guide permits? Given the limits already in place, there seems to be no resource basis for the small number proposed. The superintendent may want more flexibility given the demand or season.

STG3) Response: As with all new activities, it is reasonable for the park to allocate a small number of permits in the beginning, rather than allocating a large number of permits that may later have to be reduced based on unacceptable resource or visitor use impacts. Further, to minimize impacts to independent climbers, there are a relatively small number of opportunities available for non-concession guiding in the park. The actual number is derived from the approximate number of weeks in the summer climbing season and the original intent of allowing one opportunity per week and is based on the number of routes available.

STG4) Comment: Specific certification required for Single Trip Guides should be identified. The language in the Commercial Services Plan is vague and open to interpretation.

STG4) Response: The language regarding the certification of Single Trip Guides has been clarified. See the revised Commercial Services Plan.

STG5) Comment: Respondents suggested a variety of alternatives for the Single Trip Guides, including increases or decreases in the number of permits and number of trips per permit, changes in guiding locations, different client to guide ratios, as well as a series of operational modifications that would determine how the permit holders were selected.

STG5) Response: As is noted on page 3 of the Commercial Services Plan, “to be useful the Commercial Services Plan must be flexible . . . Party size limits, route and trail use, seasonal use dates, and other specifications may be revised in response to new information. . .” Because this activity is new, moderate limits have been proposed. In addition, it will be phased in over the first few years of plan implementation.

STG6) Comment: Many respondents suggested increasing or decreasing the client to guide ratio for Single Trip Guides and for other commercially guided trips in the park.

STG6) Response: While the planning team declined to decrease the ratio, any commercial service provider may decrease the ratio at any time. In fact, under the selected alternative, decreasing the ratio may lead to a higher number of successful summits, due to the potential need to drop-off clients (and guides with them) along the route. Increasing the ratio would result in guiding operations that would be difficult to control (as a leader) or would result in rope teams that are too large (below current safety and insurance standards).

STG7) Comment: What is the rationale for including Single Trip Guides? What public interest do they fulfill?

STG7) Response: The rationale for Single Trip Guides is provided on page 43 of the Commercial Services Plan. Single Trip Guides affirm the widely recognized use of Mount Rainier as one of the best places in North America to train for longer and more difficult climbs in Alaska and abroad. They also provide an opportunity for non- concession guides to guide on Mount Rainier.

STEP-ON GUIDES (3 comments)

SOG1) Comment: To avoid the appearance of outsourcing, Step- on Guides should be decreased or eliminated and the opportunities for guiding bus or van tours given to NPS interpreters.

SOG1) Response: In the selected alternative Step- on Guides and Day Use Hiking have been combined into Day Guiding. The purpose of Day Guiding is to provide organized groups or individual park visitors with knowledgeable guides who can enhance their visit by communicating park information and regulations. This program is meant to supplement the current park interpretive program until park staffing and budgeting allow the service to also be provided by the NPS. As noted below, training of all guides in park information and the history and mission of the park and NPS is required.

TRAINING/ORIENTATION (20 comments)

TO1) Comment: All park commercial guides should have national certification. Without certification, there is no way to be sure what type of experience park visitors will have with their guides.

TO1) Response: As noted in the Commercial Services Plan, all commercial service providers would be required to become familiar with the history and mission of Mount Rainier National Park and the NPS, including the resource protection measures and regulations at the park. Concessioners are encouraged (*Management Policies* 10.2.4.4) “to instill in their guests an appreciation of the park, its purpose and significance, its proper and sustainable management, and the stewardship of its resources.” Those operators authorized to provide interpretive services must provide formal interpretive training to their employees. This familiarity would then allow commercial service providers to fulfill the requirement to give their employees an orientation to the NPS mission and values and to then share this same information with their clients (see page 33 in the Draft Commercial Services Plan). Unfortunately, there is not a certification process or course that would fulfill a requirement for guide training. While an annual community orientation is part of current park operations, the park envisions a more detailed training session for guides operating in the park.

TO2) Comment: All climbing parties should be more thoroughly educated in Leave No Trace. Offering training via a video prior to obtaining their permit would help ensure that park resources are left in better condition.

TO2) Response: To supplement the information given to potential climbers when they get their climbing permit and the information on the park website, it has long been a goal of the park’s climbing program to offer more detailed Leave No Trace training information to climbers. As noted above, future plans call for an introductory video for all wilderness visitors and/or climbers (such as is now employed at parks like Yellowstone and Denali).

WILDERNESS MANAGEMENT PLAN (65 comments)

WMP1) Comment: Without a revision to the Wilderness Management Plan, there is no basis to restrict commercial use. The Wilderness Management Plan defines the upper use limits for each alpine and cross- country zone and backcountry camp. If there is a need to reduce these limits, the reduction should come equally from guided and unguided visitors and be presented in a revised Wilderness Management Plan.

WMP1) Response: The basis to restrict commercial visitor services is found in National Park Service Management Policies (2001): “Commercial visitor services planning will identify the appropriate role of commercial operations in helping parks to achieve desired visitor experiences. “. . .Commercial services plans will. . . determine whether proposed concession facilities and services are necessary and appropriate.” Specifically, authorization for commercial services “will enhance visitor use and enjoyment of the park without causing unacceptable impacts to park resources or values.”

In addition, as noted on page 11 of the Environmental Assessment, the General Management Plan directed the park to “Ensure that before reauthorization of commercial services occurs that the types of authorized uses are still necessary and/or appropriate, the levels of use are consistent with resource protection and quality visitor experiences, and the commercial services program can be managed in an efficient and effective manner.”

As shown in the discussions on page 44 and 46 of the Environmental Assessment and in Table 8 (also page 44) and Figure 2 (page 48 of the Environmental Assessment), general wilderness and climbing use of the park has risen significantly over time. Because national trends predict ongoing increases in these activities (see PriceWaterhouse Coopers analysis of the revised preferred alternative), these uses have the potential to continue to increase to a point where adverse effects on park resources, especially alpine vegetation (see pages 28- 31 of the Environmental Assessment), may occur. Wilderness visitors already have difficulty accessing Wonderland Trail campsites for through trips on the trail during July and August. Climbers already find Camp Muir crowded in summer. And, nineteen percent of visitors reported seeing unacceptable damage to park resources (see page 51 of the Environmental Assessment).

Referring to Tables 10, 11 and 12 (in the Environmental Assessment), it is clear that if actual visitor use were to climb to the physical levels set in the Wilderness Management Plan, that such use could escalate to nearly two and a half times what it was in 2001, when these unacceptable crowding and resource damage impacts were noted.

In Mount Rainier and other parks, what is a reasonable level of commercial use for a necessary activity is different from a reasonable level of use for an appropriate activity. Whereas on the high use Muir Route, commercial activity has varied from 27 to 37 percent over the 12 year period shown in Table 8, commercial use of the recently designated moderate use Emmons Route has been much less. And, commercial use of the Wonderland Trail, where technical skills are not needed and independent use is extremely high, has been even lower. As a result, setting limits that affect independent and commercial visitors equally would be inconsistent with previous use and management actions. As noted on page 57 of the Environmental Assessment “additional future regulation of independent visitor use limits may be necessary . . . and would further minimize” the potential for adverse impacts on park resources noted above.

WMP2) Comment: How can Wilderness Management Plan use limits be altered by the Commercial Services Plan?

WMP2) Response: While the Wilderness Management Plan does indeed set overall use limits for each alpine and cross- country zone and backcountry camp, it does not specify the percentage of

these overall use limits that should be reserved for commercial use. Specification of these commercial use limits is appropriate in a Commercial Services Plan, particularly with respect to the issuance of CUAs which would be unlimited in the absence of the identification of such use limits. As noted by the comment, altering the total limits, is appropriate for the revised Wilderness Management Plan.

WMP3) Comment: Issue a flexible prospectus with the former Wilderness Management Plan limits in place, including the historical percentage of use dedicated for commercial services. Upon revision of the Wilderness Management Plan or carrying capacity analysis, revise these numbers as appropriate.

WMP3) Response: As noted above regarding concessions contracts, the concessioner is required to provide a service – therefore there must be a reasonable opportunity for the concessioner to achieve a profit. For a bidder to prepare and present a credible business plan, they have to know what their allocation will be over the term of the contract. Businesses are unable to project revenues, amortize expenses and propose a realistic franchise fee in a climate where their allocation is modified annually.